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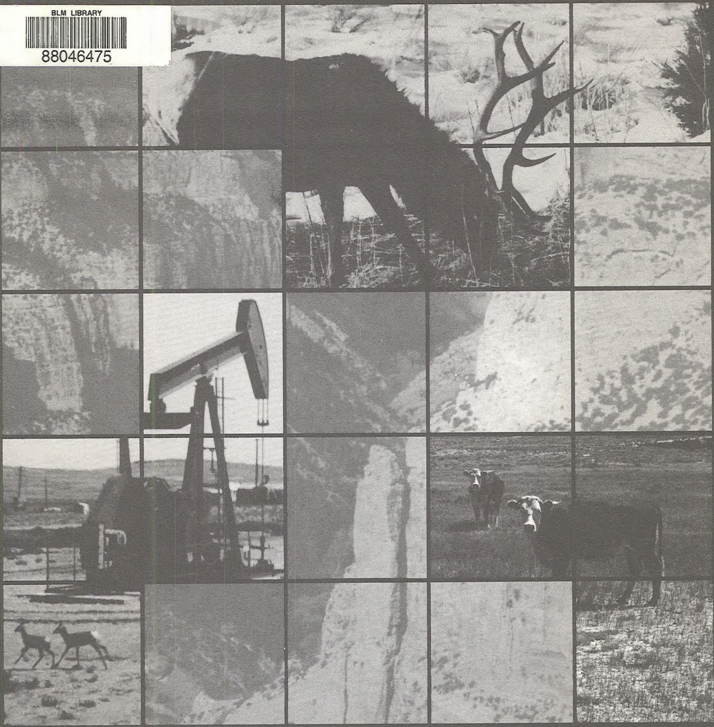

WASHAKIE

Resource Management Plan
Final Environmental Impact Statement

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1987

March 3 1849

United States Department of the Interior

TAKE PRIDE IN AMERICA

BUREAU OF LAND MANAGEMENT
WYOMING STATE OFFICE
P.O. BOX 1828
CHEYENNE, WYOMING 82003

Dear Reader:

Enclosed for your review is the final environmental impact statement (EIS) and proposed resource management plan (RMP) for the Washakie Resource Area. This document presents the Proposed Plan for managing public lands and resources in the resource area. The Proposed Plan is a refinement of the preferred alternative presented in the Draft EIS published in November 1986.

The Draft RMP/EIS is an integral part of this planning document. The two documents together constitute the Final EIS. The text and maps from the Draft EIS are needed as reference for this document.

All parts of the Proposed Plan may be protested by parties who participated in the planning process. Protests should be sent to the Director (202), Bureau of Land Management, 1800 C Street NW, Washington, D.C. 20240. Protests must be postmarked within 30 days after this final EIS is filed in the *Federal Register* by the Environmental Protection Agency. The protests should include the following information:

A statement of the issue or issues being protested.

A statement of the part or parts of the plan being protested.

A copy of all documents addressing the issue or issues that were submitted during the planning process by the protesting party, or an indication of the date the issue or issues were discussed for the record.

A concise statement explaining why the proposed plan is believed to be wrong.

At the end of the 30-day period, the Proposed Plan, excluding any portion under protest, will become final. Approval will be withheld on any portion of the plan under protest until final action on the protest has been completed. Any significant change made as a result of a protest will be made available for public review and comment before it is approved.

I want to personally thank those who have participated in the planning process. I hope your involvement will continue as we move forward to implement the plan and manage the public lands and resources in the Washakie Resource Area.

Sincerely,

Hillary A. Oden

Hillary A. Oden
State Director

#20702720

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FINAL

ENVIRONMENTAL IMPACT STATEMENT
PROPOSED RESOURCE MANAGEMENT PLAN
for the
WASHAKIE RESOURCE AREA
WORLAND, WYOMING

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U.S. Department of the Interior
Bureau of Land Management
1987

Hillary A. Oden 9-11-87

Wyoming State Director Date

Summary

INTRODUCTION

The Proposed Resource Management Plan/ Final Environmental Impact Statement (RMP/ EIS) presents the Proposed Plan for managing approximately 1.23 million acres of public land and 1.6 million acres of federal mineral estate administered by the Washakie Resource Area (WRA) of the Bureau of Land Management (BLM).

The Washakie Resource Area, in north-central Wyoming, is in the BLM's Worland District. It covers portions of three counties: Big Horn, Hot Springs, and Washakie. Those portions of Hot Springs and Washakie counties east of the Bighorn River and the portion of Big Horn County east of the Bighorn River and south of Shell Creek are within the resource area administrative boundary. Lands in the Wind River Indian Reservation and the Bighorn National Forest within the area described above are excluded from the planning area (see Map 1).

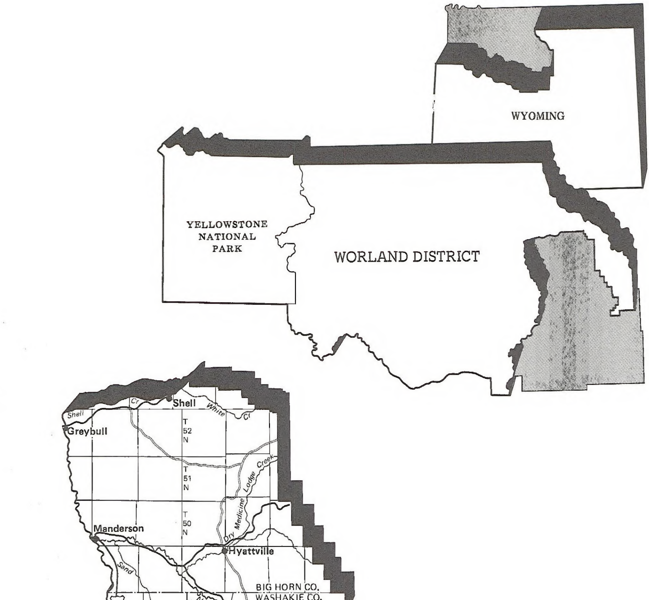
As a result of further review by BLM specialists and comment from the public, changes have been made in the Draft RMP/EIS and have been incorporated into this document.

Statements of resource management objectives for several programs have been added in the description of the proposed plan. The term "Range Management" has been revised to "Range and Livestock Grazing Management," as a result of a comment from the public. The term "Watershed Management" has been changed to "Soil and Water Management."

One change is in regard to the proposal in the Preferred Alternative and Alternative D, to withdraw the 11,200 acre proposed Spanish Point Karst Area of Critical Environmental Concern (ACEC) from mineral leasing. It has been determined that the use of a withdrawal from mineral leasing is unnecessary and is inappropriate in the context of the mandates of the Federal Land Policy and Management Act (FLPMA). The legal basis for a "no lease" decision is the land use plan (RMP). Therefore, in this document, the proposed withdrawal from mineral leasing has been changed to a leasing closure, while the proposal to withdraw from the nondiscretionary land laws, including mineral entry (e.g., establishing claims on locatable minerals), remains unchanged.

Some minor changes in wording have been made to the text of the Standard Oil and Gas Stipulations, printed as Appendix A of the Draft RMP/EIS. A revised Appendix A has been printed in this document.The revised Appendix A also discusses use of the standard oil and gas stipulations as guidelines for all other surface disturbing activities.

Questions have been asked regarding the appropriateness of applying the standard stipulations to oil and gas leases on split estate lands (those where the surface is not owned by the federal government while the subsurface ownership remains with the government). Oil and gas leases issued on split estate in the Washakie Resource Area have had the standard stipulations applied. That policy will continue. It is appropriate for the BLM to issue leases on split estate with those stipulations attached, to reserve the right to have them enforced if activities on the lease would affect threatened and endangered species, cultural or historic values, or adjacent federal lands where important values would be at risk. The issuing of a lease with those stipulations attached does not automatically mean that the stipulations would be enforced; each exploration or development proposal on a lease must be considered on its own merits to determine if the stipulations should be applied.



Map 1

GENERAL LOCATION MAP

Washakie Resource Management Plan

A portion of the planning area was identified as having moderate potential for hydrocarbon occurrences (page 9 and Map 8 of the Draft RMP/EIS). Additional analysis by BLM geologists related to the Draft RMP/EIS and the Draft Washakie Wilderness EIS, comments on the Draft from the State of Wyoming's Geological Survey, and reports published by the Geological Survey of Wyoming and the U.S. Geological Survey all indicate that the potential for the northeastern portion of the planning area is low rather than moderate.

There is concern that the Draft RMP/EIS does not adequately describe the basis from which the impacts from oil and gas activities were developed. Thus, Appendix L, a prediction of future development, has been added to the Final EIS to allay that concern. The impact analysis in the Draft RMP/EIS was based on that scenario, which used historical data from the last ten years to predict development for the next ten years. The assumption was made that the activity in the oil and gas industry during that period, with its ups and downs, would approximate the activity for the next ten years.

Comments from the public identified as shortcomings in the Draft RMP/EIS the failure to consider the use of "no leasing" of oil and gas to protect important wildlife habitats or to consider widespread "no leasing" in general. Appendix M summarizes additional analysis undertaken by the planning team on the subject of "no leasing."

HOW TO USE THIS DOCUMENT

The focus of this Final EIS is on the Proposed Plan. This document presents a complete, comprehensive Proposed Plan for the Washakie Resource Area in Chapter 2. Because portions of the Draft RMP/EIS have not been reprinted, this document should be used together with the Draft RMP/EIS for a full description of all alternatives considered and their potential environmental impacts.

The summary comparison of management actions (Table 1) and the summary comparison of impacts (Table 2) from the Draft RMP/EIS are incorporated by reference.

Chapter 1 of the Draft EIS was not reprinted in this document. Chapter 1 describes the purpose of and need for the RMP, which have not changed.

Chapter 2 of the Draft RMP/EIS has not been reprinted in its entirety. For a description of all the alternatives considered, the reader should refer to Chapter 2 of the Draft. In this document, Chapter 2 contains a complete description of only the Proposed Plan which is a modification of the Preferred Alternative in the Draft RMP/EIS. This modification was a result of public comments and additional review by BLM specialists of the Draft RMP/EIS. The maps and tables in the Proposed Plan have been renumbered from the Draft, to aid in continuity. All other maps and tables retain their original numbers.

With the exception of some corrected tables and maps, Chapter 3 of the Draft RMP/EIS, describing the Affected Environment, has not been reprinted. For a description of the Affected Environment, the reader should refer to Chapter 3 of the Draft.

Chapter 4 of the Draft RMP/EIS, Environmental Consequences, has not been reprinted, with the exception of some corrected tables. For a description of the Environmental Consequences by alternative, the reader should refer to Chapter 4 of the Draft. The differences between the environmental consequences of the Preferred Alternative in the Draft RMP/EIS and those of the Proposed Plan in the Final EIS are not substantive and did not result in noticeable changes in impacts.

Chapter 5 of the Draft RMP/EIS, which describes the Consultation and Coordination that occurred throughout the planning process, has been updated and reprinted in this document (with the exception of the List of Preparers). As part of the updating, Chapter 5 includes the public comments on the Draft RMP/EIS and the BLM's responses to those comments. Chapter 5 also includes the Changes in Text (Table 47), which are the minor changes made to the Draft RMP/EIS, including those which are printed in Chapter 2 of this document.

Appendixes A, B, D, E and F have been modified and are reprinted in this document. Appendixes L (Future Development Predictions for Oil and Gas), M (Summary of Analysis Regarding "No Leasing"), N (Public Land Tracts Withdrawn or Pending Withdrawal), and O (Cultural Resources/Natural History Program Objectives and Implementation Process) have been added to respond to comments from the public or from BLM specialists.

The other appendixes, Glossary, References, and the List of Preparers are incorporated by reference from the Draft RMP/EIS.

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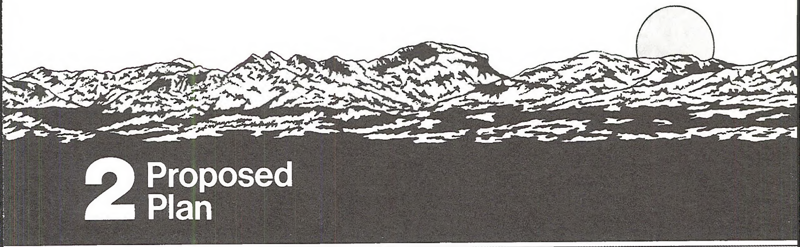
1 Purpose Of and Need For Action

Chapter 1 of the Draft RMP/EIS has not been reprinted. Refer to the Draft and Table 47 in the Final RMP for the text and changes in text.



2 Proposed Plan

DESCRIPTION OF THE PROPOSED PLAN

The Proposed Plan is a comprehensive resource management plan (RMP) for the Washakie Resource Area. It generally allows resource use with emphasis on protection of the natural environment. The Proposed Plan is made up of the management prescriptions for wild horses and soil and water management from Alternative D, a combination of leasable mineral prescriptions from Alternatives B, C, and D, the remaining resource management prescriptions from Alternative C, and the section titled "Management Common to All Alternatives," all from the Draft RMP/EIS.

Minerals Management

Management Actions

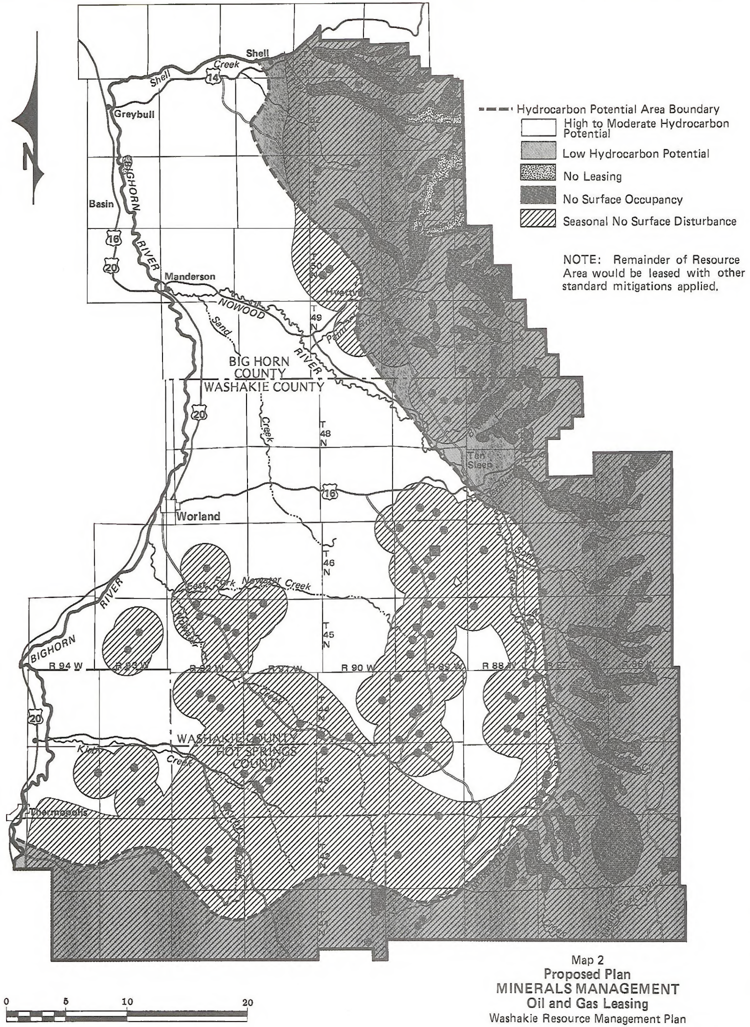
Leasable Minerals

Leasable minerals found in the planning area are oil, gas, coal, tar sand, and oil shale. Only oil, gas and tar sand are addressed in detail.

Oil and Gas. All public lands would be open for consideration for the exploration and development of oil and gas except those closed to leasing. Any decisions that would affect oil and gas leasing or add restrictions to oil and gas exploration and development activities are subject to valid existing rights. Once an oil and gas lease has been issued, it constitutes a valid existing right and the BLM cannot unilaterally change the terms and conditions of that lease. However, reasonable and necessary conditions of approval would be applied to APDs, Sundry Notices and any other use authorizations, to protect other resource uses and values, consistent with the original intent of the lease. Therefore, where "no surface occupancy" restrictions would be applied to oil and gas activities or where an area would be closed to oil and gas leasing, existing leases would not be affected and such decisions could not be implemented on a leased area until the lease expires and the new restrictions are added to any new leases issued for the same area. In the event exploration activities result in producing oil or gas wells, specific mitigation requirements for surface resource values would be developed, based on environmental analyses of plans of operation or development.

Oil, gas, and tar sands would be leased with appropriate parts of the Wyoming BLM Standard Oil and Gas Lease Stipulations, or future modifications of those stipulations (Map 2 and Appendix A).

- Approximately 11,200 acres in the proposed Spanish Point Karst ACEC (about 1 percent of the federal mineral estate) would be closed to leasing (Table 1).
- Approximately 117,800 acres (7 percent of the federal mineral estate) would be leased with a "no surface occupancy" restriction to protect important wildlife habitat, and cultural and recreation sites.
- Approximately 953,500 acres (60 percent of the federal mineral estate) would be leased with seasonal restrictions to protect important wildlife habitat.
- Approximately 520,500 acres (33 percent of the federal mineral estate) would be leased with other standard surface protection restrictions applied.



Map 2
Proposed Plan
MINERALS MANAGEMENT
Oil and Gas Leasing
Washakie Resource Management Plan

TABLE 1

MINERALS MANAGEMENT - ACRES OF OIL AND GAS LEASE RESTRICTIONS BY HYDROCARBON POTENTIAL

PROPOSED PLAN

Category	Hydrocarbon Potential[1] Mineral Estate Acres (Estimated)	
	High to Moderate	Low
Lease Restrictions (General)		
Closed to Leasing[2]	0	11,200
No Surface Occupancy[2]	10,000	107,800
Seasonal Use Restrictions	515,000	438,500
Lease Under Other Stipulations	437,000	83,500
Total	**962,000**	**641,000**
	(Note: Numbers rounded)	
Specific Areas with No Surface Occupancy Lease Restrictions		
West Slope Canyons		83,500
Middle Fork Powder River		900
T & E Species Nesting Area	250	
Castle Gardens Campground	110	
Bates Battlefield		1,040
Medicine Lodge Archeological Site		100
Sage Grouse Leks	9,450	4,660
Elk Calving Areas		17,600
Specific Areas with Seasonal Use Restrictions		
Other Sage Grouse Habitat	337,000	155,000
Crucial Elk Winter Range	4,800	120,000
Elk Winter Range	173,300	163,500

[1] Refer to "Evaluation Criteria for Hydrocarbon Potential" in Chapter 1 of the Draft RMP/EIS for a description of the methodology used to determine hydrocarbon potential.

[2] The "closed to leasing" and the "no surface occupancy" stipulations would be phased in over the life of the plan by application of those restrictions on leases as the are issued. These stipulations would not be applied retroactively to existing leases.

Contingency plans for the release of hydrogen sulfide gas (H_2S or "sour gas") would be required for all drilling proposals which would penetrate a known or suspected H_2S-bearing formation. These plans would provide for detection of H_2S, countermeasures to control the release, and, if necessary, controlling access to the drill site, notifying appropriate law enforcement agencies, and evacuating the public in the expected radius of exposure.

Tar Sand. Included in the acreage listed above under other surface protection mitigation measures or under "no surface occupancy" restrictions are about 55,000 acres near the proposed Spanish Point Karst ACEC which were leased for oil and gas prior to enactment of the Combined Hydrocarbon Lease Act (CHLA) of 1981. Deposits of tar sands, other than the known Trapper Canyon deposit, are possible but unlikely in those leased areas. Because of constraints associated with those leases, any tar sands cannot presently be developed. When those leases expire between now and 1991, the areas would be considered for re-leasing. There are no pre-CHLA leases that would directly affect the proposed Spanish Point Karst ACEC. Therefore, new leases on the 55,000 acres could be issued, subject to the management prescriptions contained in the Proposed Plan.

Oil and gas leases on an additional 5,100 acres in the same general area were issued after enactment of the Combined Hydrocarbon Leasing Act (CHLA) of 1981. As a result, if any tar sand deposits exist in the leased area, they could be developed through strip mining or other means under the right granted by the existing leases. It is assumed that any tar sand deposits would be developed in the short-term (through about 1992 when the leases expire) at the rate of about 10 acres per year. Any leases in production on the expiration date would remain in effect. Leases not in production would expire. The decision to re-lease or not, and what restrictions would apply, would be in conformance with the management prescriptions in the Proposed Plan. Approximately 1,400 of the acres in post-CHLA leases affect the proposed ACEC. Those leases or portions of leases within the proposed ACEC would not be re-leased if, in fact, they expired and the areas were considered for re-leasing.

Geophysical Exploration. All proposals for geophysical exploration would be evaluated on a case-by-case basis. Suitable surface protection measures based on the Wyoming BLM Standard Oil and Gas Lease Stipulations (or future modifications), and access restrictions (ORV designations) would be applied. Generally, geophysical exploration would not be allowed on BLM-administered surface in areas closed to oil and gas leasing. About 6,750 acres (less than 1 percent of the federal surface) would be closed to geophysical exploration, including about 250 acres of threatened and endangered species nesting areas and about 6,500 acres of BLM-administered surface in the proposed Spanish Point Karst ACEC. Geophysical exploration on the remaining 1,227,250 acres (99 percent of the federal surface) would be affected by vehicle use limitations and surface protection restrictions of various kinds (Table 2).

Coal. Coal leasing and development was not an issue for the RMP. The coal in this area of Wyoming has either unknown or low development potential in the foreseeable future. No leasing and development interest was identified by anyone during the call for coal resource information, the issue identification process, or during the alternative formulation process. Therefore, the coal screening process, including the application of unsuitability criteria, has not been conducted. This does not imply, however, that coal exploration, leasing and development is incompatible with this plan. Coal exploration would be allowed under the guidance established for surface disturbing activities presented in Appendix A. If an application for a coal lease is received sometime in the future, an appropriate land-use and environmental analysis, including the coal screening process, would be conducted to determine whether or not the coal areas applied for are acceptable for development and for leasing consideration. The RMP would be amended as necessary.

The Washakie Resource Area is not within a designated coal production region. Federal coal leasing would be considered apart from the competitive leasing process set out in 43 CFR 3420.3 through 3420.5-2. This is essentially done on a case-by-case basis, called "Leasing on Application," under the appropriate provisions of 43 CFR 3425 (note that the sale and issuance of federal coal leases under these provisions is still done through a competitive bidding process).

Locatable Minerals

All public lands not formally withdrawn or segregated from mineral entry would be open for the exploration and development of locatable minerals. Only bentonite and gypsum are discussed in detail because they are the primary locatable minerals found in the Washakie Resource Area. Discretionary management of locatable minerals is limited. If necessary, areas of special interest or high sensitivity would be formally withdrawn from mineral entry. In other situations, the regulations listed in 43 CFR 3809 and agreements made with the State of Wyoming pursuant to those regulations would be applied to reduce unnecessary and undue degradation of other resources as a result of mining. It is expected that bentonite reserves would continue to be developed on a large scale and the development of gypsum would also continue but in very isolated locations and on a very small scale.

Approximately 76,500 acres are withdrawn or are pending withdrawal from mineral location to protect other resources from damage by mining. Protected from all forms of mineral entry are the Castle Gardens Campground (110 acres) and the Bates Battlefield (1040 acres). Approximately 60,350 acres in stock driveways and about 3,400 acres in public water reserves are withdrawn from the location of non-metaliferous minerals. Approximately 11,200 acres in the proposed

TABLE 2

MINERALS MANAGEMENT - GEOPHYSICAL EXPLORATION RESTRICTIONS (Estimated Surface Acres)

PROPOSED PLAN

Restriction	Hydrocarbon Potential High to Moderate	 Low
Closed[1]		
Spanish Point Karst ACEC		6,500
T&E Species Habitat	250	
Total Closed	**250**	**6,500**
Limited[2]		
Permitted/Licensed Use		
West Slope Canyons		88,200
Existing Roads & Trails		
Castle Gardens	110	
Wetlands	3,000	
Time or Season of Use		
Medicine Lodge		12,000
Designated Roads & Trails		
Middle Fork		900
Upper Nowood		32,000
Laddie Creek		4,700
Designated Roads & Trails and/or Season of Use		
Crucial Wildlife Habitat or Fragile Soils	404,130	285,200
Total Limited	**407,240**	**422,700**
Total Open	**333,000**	**64,500**

NOTE: All geophysical exploration would be subject to ORV use designations (see Table 4).

[1] "Closed" applies to areas that would be closed to the leasing of oil and gas or that would be closed to ORV use.

[2] "Limited" includes areas open for leasing of oil and gas but subject to restrictions based on the Wyoming BLM Standard Oil and Gas Lease Stipulations, including "no surface occupancy" or seasonal use restrictions.

Spanish Point Karst ACEC are pending withdrawal. Additional areas may be proposed for withdrawal from mineral location on a case-by-case basis since withdrawal is a valid technique for protection of areas with special values. Descriptions of the withdrawn tracts are provided in Appendix N. Refer to Appendix G in the Draft RMP/EIS for a description of the tracts pending withdrawal.

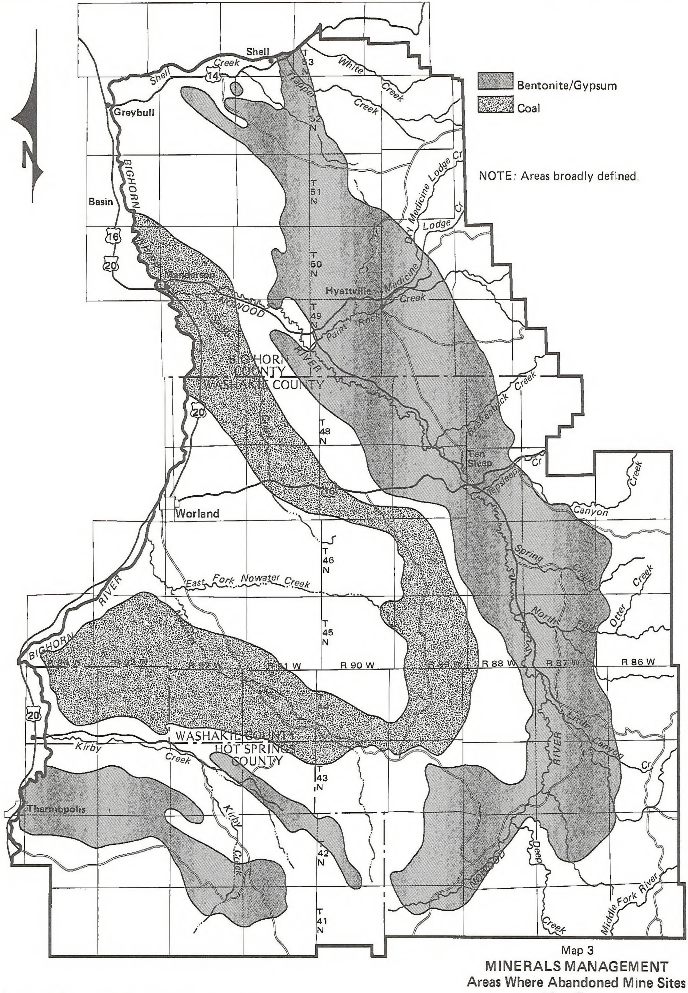
Abandoned mine sites would be recommended for reclamation under the Abandoned Mined Land Program (Map 3).

Salable Minerals

Sales and free use of salable minerals, such as sand and gravel, would occur in existing pits along the Bighorn and Nowood rivers and near Manderson and Ten Sleep. Any new material extraction sites would be subject to site specific analysis.

Geologic Landmarks

Important geologic landmarks, including fourteen known sites totalling an estimated 150



Map 3

MINERALS MANAGEMENT

Areas Where Abandoned Mine Sites May Occur

Washakie Resource Management Plan

acres, would be protected through the use of surface protection restrictions and discretionary management authority. A list of geologic landmarks and their locations is on file at the Washakie Resource Area Office.

Land and Realty Management

Management Actions

Disposal of public lands (e.g., transfer from the administration of the BLM to other federal agencies, or local or state governments, or disposal through methods such as Desert Land Entry, public sale, exchange, State indemnity selection, or Recreation and Public Purposes leases or patents) would be considered on a case-by-case basis. Areas having tracts which may have potential for disposal are shown on Map 4. Appendix B includes a list of tracts which may be suitable for consideration for disposal. Prior to any disposal action, lands would be evaluated for compliance with the disposal criteria that are also listed in Appendix B. Future proposals for disposal of lands not listed or identified to date would also be considered on a case-by-case basis.

In situations of agricultural trespass, the lands may be restored to the condition that existed before the trespass occurred. Or, the unique qualities of the land involved may present some opportunities for sale or exchange. Each situation would be reviewed on a case-by-case basis according to the criteria listed in Appendix B.

Acquisition of non-BLM administered lands or interests in lands would be considered on a case-by-case basis to achieve management objectives. Acquisition by the BLM would entail methods such as exchanges or obtaining easements. Parcels that may be suitable for BLM consideration for acquisition are listed in this document, in Appendix B.

Public water reserves withdrawn under Executive Orders and other classification orders would be reviewed to determine if they meet the retention requirements of legal opinions of the Solicitor of the Department of the Interior and of the agreement made between the Department of Justice (for the Department of the Interior) and the State of Wyoming regarding the adjudication of water rights in the Bighorn River drainage. Withdrawals would be terminated on those public water reserves that do not meet the retention requirements.

Existing transportation and utility corridors for roads, pipelines, and power lines would be designated as right-of-way corridors, which would be the preferred locations for existing and future right-of-way grants (Map 5). Right-of-way corridors would include:

— major linear rights-of-way zones comprising about 250 miles (40,000 acres), and

— major short segment linear rights-of-way zones (as in oil fields) comprising about 105,000 acres.

Approximately 1,089,000 acres would not be included in designated corridors but would be available for rights-of-way under certain circumstances. Of this amount, about 250 acres of threatened and endangered species nesting areas would be classed as right-of-way exclusion areas. Right-of-way avoidance areas would total about 395,000 acres comprising:

— The proposed Spanish Point Karst Area of Critical Environmental Concern (6,500 acres of public surface),

— Potential threatened and endangered species habitat and wetland/riparian habitat (250,000 acres),

— The Medicine Lodge, Renner, and Billy Miles wildlife habitat management units (20,500),

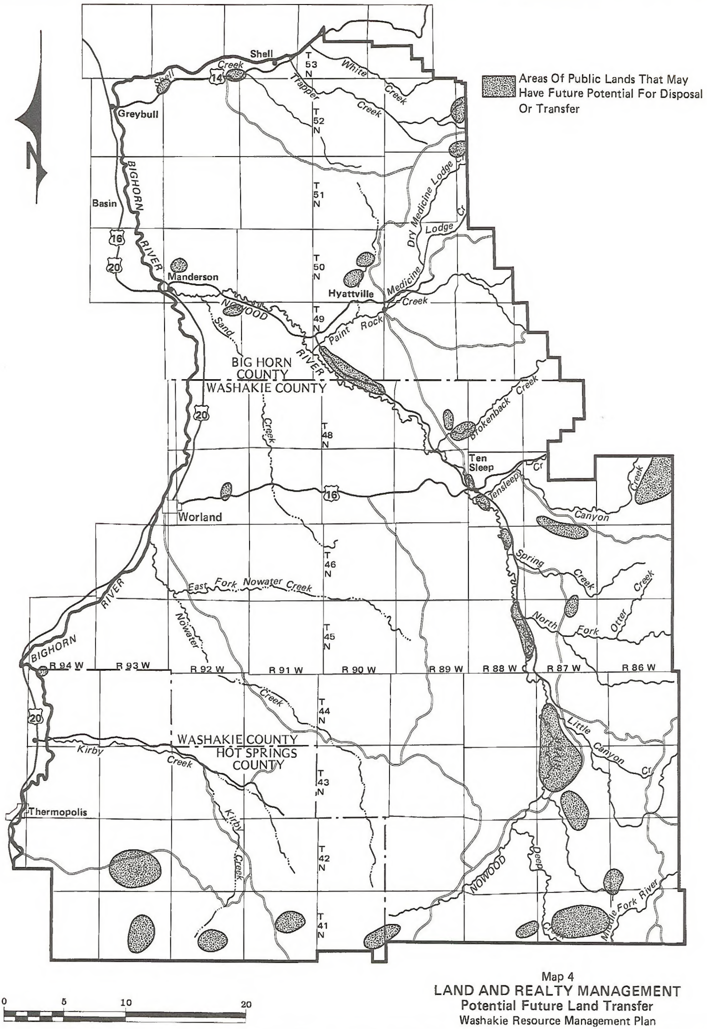
— Semi-primitive nonmotorized Recreation Opportunity Spectrum (ROS) areas (117,300 acres), and

— Cultural Resource Sites (750 acres).

Powerline construction would not be allowed within one-half mile of bald eagle nests. Powerline construction in sensitive wildlife habitats and across streams would be required to incorporate standard or special design features to reduce bird collisions and reduce impacts to habitat. Additional powerline construction limitations would be applied on a case-by-case basis in special situations to reduce bird collisions

Classification and Multiple Use Act retention and disposal classifications (orders W-12616 and W-12617) on approximately 144,500 acres in Hot Springs County would be terminated. Discretionary management activity in areas covered by these orders would be dictated by the RMP.

The administrative site withdrawal associated with Worland's Green Hills Municipal Golf Course would be terminated to allow the city to apply for a Recreation and Public Purposes patent.

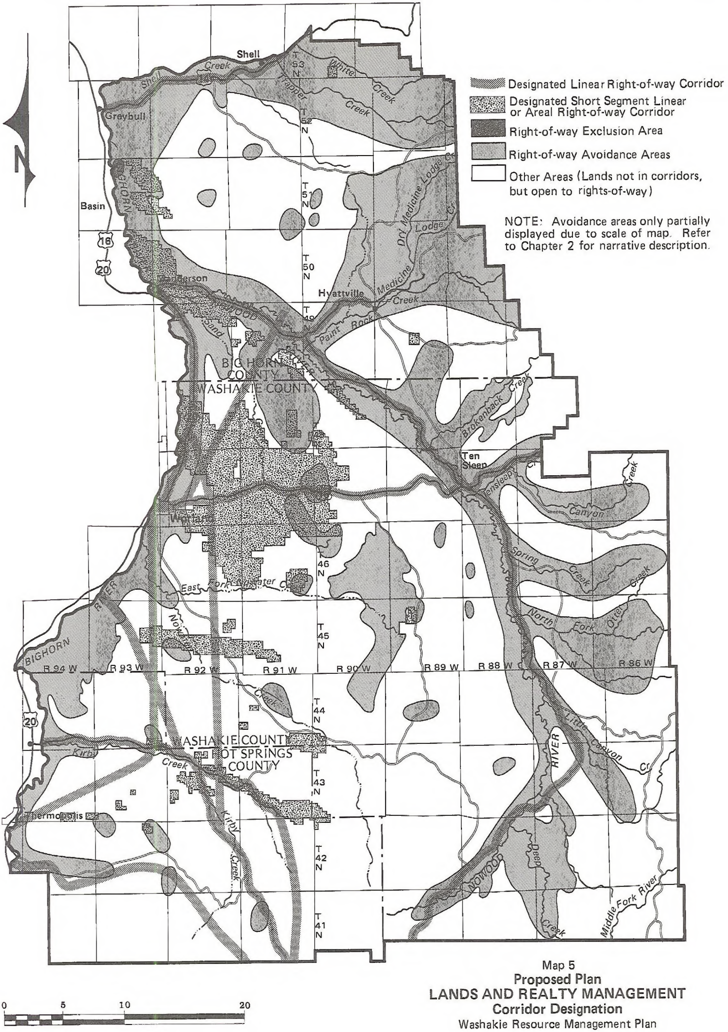


Map 4

LAND AND REALTY MANAGEMENT

Potential Future Land Transfer

Washakie Resource Management Plan



Map 5
Proposed Plan
LANDS AND REALTY MANAGEMENT
Corridor Designation
Washakie Resource Management Plan

Forest Management

Resource Management Objective

To enhance watershed, wildlife, and forest values through the maintenance of a viable and healthy timber base.

Management Actions

Fuelwood would not be harvested in riparian areas unless conducted to improve fish and wildlife habitat. Cottonwood would be protected for wildlife needs and would not be sold for fuelwood.

Within the areas classified as commercial forest land, timber harvesting would be conducted in a manner that would protect and benefit watershed, wildlife, and wetland/riparian habitat values.

Slash resulting from timber harvesting would be lopped and scattered, roller chopped, or burned to provide watershed protection, nutrient recycling and wildlife habitat improvement.

Silvicultural practices would be allowed in elk calving areas if such practices would benefit the calving areas.

A precommercial thinning backlog on 450 acres of commercial forest land would be eliminated over 10 years and future backlogs would be avoided by regular thinning of all overstocked stands when they reach the 20 to 30 year age class.

A reforestation backlog on 200 acres of unstocked forest land would be eliminated over 10 years. Additionally, all timber stands that are harvested and are not reestablished by natural regeneration would be planted with conifer species.

The West Slope Forest Management Plan would be developed based on a comprehensive review of all forest related resource needs.

The harvest of forest products and other vegetative treatments would be considered on all forest and woodland areas to accomplish wildlife, watershed and forest management objectives. Harvesting and other practices would be designed to accomplish one or more of the following:

- Improve wildlife cover and other habitat conditions,
- Maintain existing levels of thermal cover for wildlife,
- Increase forage production in woodlands for wildlife or livestock,
- Compensate for loss of wildlife habitat because of natural tree mortality,
- Harvest stands with heavy tree mortality and fuels accumulation,
- Increase aspen cover,
- Increase timber stand diversity and age structure,
- Reduce fire danger,
- Increase recreational opportunities in healthy, vigorous timber stands,
- Provide fuelwood cutting opportunities,
- Improve health and vigor of vegetation in stream buffer stands,
- Prevent the transport of sediments and harvesting debris to ephemeral and perennial streams, and
- Allow pre-harvest watershed condition to be reestablished through reforestation.

Actual harvest levels would be based on treatments needed to meet management objectives. A maximum of 1 million board feet of forest products including 100 thousand board feet of fuelwood, posts and poles, could be harvested from about 130 acres annually from the timber production base without exceeding the long-term sustained yield capacity. Allowable cut figures, when calculated, would reflect the level of harvest needed to develop and maintain the desired structure of the forest land base.

Vegetative treatments would consist of clearcuts and shelterwood cuts in lodgepole pine, and selective or shelterwood cuts in the various other coniferous types. About 15 percent of the annual harvest would come from lodgepole pine and 85 percent would come from the other coniferous types. Woodland treatments would be done primarily in aspen and juniper stands. The objective of aspen treatments would be to revitalize decadent stands, increase stand density, and increase canopy cover. Juniper would be managed to provide improved wildlife habitat and forage conditions. Factors such as local demand, market conditions and the need for enhancement of other resource values may cause fluctuations in the volume of timber harvested in any one year.

Various management techniques would be applied to obtain the management goals of timber production and enhancement of other resource values if traditional forms of logging are not possible or if stands are not purchased when offered for sale. These may include:

— Helicopter logging,

— Burning instead of logging,

— Disease treatment by spraying, and

— Spraying of grasses and shrubs to eliminate competition with tree species.

Wild Horse Management

Management Actions

All the wild horses in the Zimmerman Springs Wild Horse Herd Area (Map 6 in the map pocket of the Draft RMP/EIS) would be removed from the area and be made available for adoption through the BLM's Adopt-A-Horse Program or be relocated to a designated Wild Horse Herd Management Area in the Worland District. Removal would reduce competition with livestock in the Zimmerman Springs area and would reduce damage to range developments, soil and vegetation.

Range and Livestock Grazing Management

Resource Management Objective

To provide forage for livestock grazing, to reduce livestock grazing conflicts and to improve ecological range condition.

Management Actions

All grazing allotments have been categorized. (In the Draft RMP/EIS, see Map 6, in the map pocket, for allotments and Appendix C for allotment categorization criteria. In this document, refer to the revised Appendix D for the categorization of allotments and the revised Appendix E for a discussion of grazing management.) All "I" and "M" category allotments and allotment management plans (AMPs) would be monitored. Some monitoring also may occur in "C" category allotments. Any adjustments in livestock grazing use would be made as a result of monitoring and in consultation with grazing permittees and other affected interests. Monitoring would be continued following adjustments in grazing use to assure allotment management objectives are being met.

Approximately 1,400 existing range development projects would be maintained (Table 3).

TABLE 3

EXISTING RANGE PROJECTS IN THE WASHAKIE RESOURCE AREA

Project Type	Units	Number
Pipelines	Miles	105
Dams, Catchments, Reservoirs	Acres	1,827
Corrals and Cattleguards	Projects	69
Exclosures, Enclosures	Miles of Fence	24
Fences	Miles	1,124
Springs	Projects	45
Water Wells	Projects	91
Contour Furrowing	Acres	1,100
Sagebrush Spraying	Acres	35,340

Authorized grazing use would be permanently or temporarily adjusted for the 300-500 acres taken out of production each year by mineral patents, other disposals and other permanent or temporary uses.

Where appropriate, the BLM would assist the Wyoming Game and Fish Department in accomplishing the Department's management objectives for wildlife habitat management units and other important habitats. Actions that may be employed include habitat improvement projects, reducing or eliminating livestock grazing, or other practices that would help meet management objectives and enhance the quality of these habitats.

Approximately 2,000 animal unit months (AUMs) of forage traditionally used when permittees trail their livestock from one pasture or allotment to another, but not allocated to specific allotments, would be allocated for trailing in the Worland-Ten Sleep, Nowater, Rome Hill, and Cottonwood stock driveways. These AUMs are not included in the allocations for grazing within the allotments.

Access on the South Trapper Rim, South Brokenback, and North Brokenback roads and a crossing of the Nowood River between Ten Sleep and Box Elder Ranch would be acquired, to facilitate range management and other uses of the public lands.

Any range projects proposed would first be subjected to economic and environmental analyses. Adequate information to determine the economic benefits and costs and the environmental consequences would be collected before projects are approved for construction. All projects would be designed to meet allotment management objectives and to be multiple-use projects or at least to minimize any impacts to other resource values. Private contributions of labor, materials, and/or funds would be encouraged on all projects. Specifications for these projects are contained in BLM Manual 1740 and the BLM Manual Handbooks in the 1740 series.

Authorized livestock grazing use would not exceed 143,000 AUMs annually.

Livestock grazing would continue as currently authorized on all 307 allotments administered by the Washakie Resource Area, unless adequate data are available to support adjustments. Season of use, distribution, and kind, class and number of livestock would be adjusted to improve vegetative and wildlife resources and to protect areas unsuitable for livestock grazing on a case-by-case basis or as AMPs are developed on the allotments. These adjustments would allow for good or better range condition on an estimated 960,000 acres, over the long-term. Various management actions would be implemented to accomplish these objectives. Among the actions that may be used are those listed in the revised Appendix E.

Seasons of use would be established on those allotments that currently have no season of use designated. Projected seasons of use in the allotments would be as follows: (1) no particular season designated, no allotments; (2) all spring, 5 percent of the allotments; (3) combination spring and other, 17 percent of the allotments; (4) summer, 36 percent of the allotments; (5) fall and winter, 42 percent of the allotments. (Refer to Appendix D for details on allotments.)

The following are the types and estimates of new projects that would be implemented, with funding priority given to "I" category allotments:

- 200 miles of fence,
- 70 spring developments,
- 60 reservoirs,
- 100 miles of water pipeline,
- 10 water catchments,
- 8,100 acres of sagebrush spraying, and
- 26,000 acres of prescribed fire treatment.

Subject to prior approval, including an environmental assessment, and under the supervision of the BLM, construction of livestock management facilities, implementation of grazing management systems, and the control of sagebrush and juniper stands through chemical or mechanical means or through the use of prescribed fire would be allowed on "M" category allotments, through the use of private funds. Facilities and practices must be consistent with the objectives of maintaining or improving current satisfactory range condition and forage production.

Construction of livestock management facilities using private funds, and the development of grazing systems would be allowed on "C" category allotments, subject to prior approval, including an environmental assessment, and supervision by BLM. Any projects permitted must be consistent with the management objectives of the allotment and with the RMP.

Eighteen existing AMPs are in various stages of implementation or revision. Implementation would continue until completed. Each year some of the 18 would be revised or new AMPs on "I" category allotments would be started. However, the total number worked on (existing and new) would average about three AMPs per year.

Adjustments in grazing use on "I" category allotments would be made following monitoring of the allotments or by agreement between the BLM and the permittee(s) using the allotment. The monitoring would include actual use, utilization, and climate to estimate the level of needed adjustments. All affected parties would be consulted to determine the intensity of monitoring needed, location of monitoring studies, and to develop specific allotment objectives that management must meet.

Adjustments in grazing use may include one or more of the following:

- Changes in season of use,
- Changes in class, kind and number of livestock,
- Changes in grazing management, and
- Changes in current use levels.

Additional projects needed to implement the changes (if any) would be identified. Monitoring studies (condition and trend studies) needed to determine long-term adjustment and, if necessary, to measure long-term changes in range condition would be identified and implemented.

Livestock grazing would be managed in wetland/riparian areas to allow steady, long-term restoration and improvement of degraded habitat conditions. About 185 miles of fence would be built around wetland/riparian areas, at the rate of about 10 miles per year, to improve management and to reduce problems on perennial and ephemeral streams, reservoirs, and springs. New grazing systems would be implemented to restore and enhance wetlands.

Approximately 500 acres of aspen stands throughout the planning area would be protected from livestock grazing at the rate of about 25 acres per year. Priority areas for protection are the Brokenback, Onion Gulch, and Upper Alkali Road areas. Methods of protection include the use of rest/rotation grazing systems, establishment of salt stations away from aspen stands, and fencing.

Livestock grazing may be reduced or eliminated on some allotments or portions of allotments to meet resource management objectives. Sources of springs, reservoirs, other riparian areas, including tracts identified in the Bighorn River HMP, aspen stand regeneration areas and crucial big game winter ranges are examples of areas or sites where livestock use may be eliminated if other grazing management techniques are not adequate to meet the objectives of management.

Cultural Resource Management

Resource Management Objective

Refer to the management objectives described in Appendix O.

Management Actions

The Paint Rock Canyon area contains important cultural resources. A cultural resource management plan would be prepared to guide management of the area. The area would be nominated for inclusion in the National Register of Historic Places.

Protective measures would be implemented on at least 15 known important sites, in accordance with the procedures and processes identified in Appendix O. Additional sites needing salvage or stabilization would be identified during Class III inventories.

Important paleontological sites, including 75 known sites totalling about 750 acres, would be protected through the use of surface and subsurface protection restrictions and discretionary management authority. A list of paleontological sites and their locations is on file at the Washakie Resource Area Office.

Wilderness Management

Recommendations for designation or nondesignation of Wilderness Study Areas (WSAs) as wilderness will be submitted to Congress through the Director of the Bureau of Land Management, the Secretary of the Interior and the President. Whatever wilderness decision is made by Congress will be made a part of the RMP. The detailed analyses and management prescriptions related to the WSAs are in the Draft Washakie Wilderness EIS (the supplement to the Washakie RMP/EIS).

Off-Road Vehicle Management

Management Actions

Approximately 6,700 acres would be closed to vehicular travel to protect karst areas and threatened and endangered species nesting areas (Map 6 and Table 4).

Approximately 1,227,300 acres would be designated as limited, with regard to vehicle use, to protect crucial habitat, fragile soils, wetlands, etc.

No areas would be designated as open without limitation to vehicular travel, (i.e., unrestricted use of vehicles would not be allowed).

Recreation Management

Resource Management Objective

To enhance and expand opportunities for recreation while intensively managing areas with high recreation values.

Management Actions

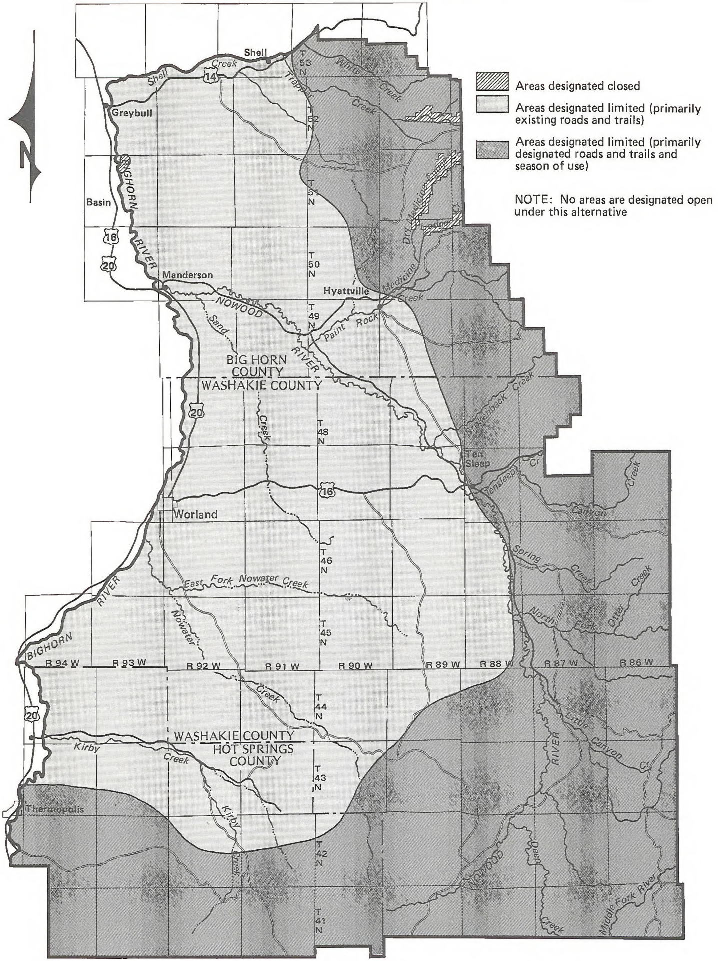
The Castle Gardens and Middle Fork campgrounds and the Lone Tree Trailhead would be maintained.

Opportunities for recreational access would be emphasized, especially in the Laddie Creek, Medicine Lodge Creek, Paint Rock Creek and Upper Nowood River areas.

Special recreation permits would be issued to authorize organized recreational use.

Recreational use of caves would be managed under a cave management plan. Goals of the plan would include:

1. Promoting the significance and importance of cave resources through interpretive and educative programs and techniques.



Map 6
Proposed Plan
OFF-ROAD VEHICLE MANAGEMENT
Washakie Resource Management Plan

TABLE 4

OFF-ROAD VEHICLE MANAGEMENT - ORV DESIGNATIONS

PROPOSED PLAN

Designation	Location	Acres
Closed	Spanish Point Karst ACEC	6,500
	T&E Species Habitat	250
Total Closed		**6,750**
Limited		
Permitted/Licensed Use	Paint Rock Canyon	5,050
Existing Roads & Trails	Castle Gardens	110
	Wetlands	5,000
	Crucial Wildlife Habitat; Fragile Soils	620,435
Time or Season of Use	Medicine Lodge Habitat Unit	4,300
Designated Roads & Trails	Upper Nowood; Laddie Creek; Middle Fork	44,000
Designated Roads & Trails and/or Season of Use	Crucial Wildlife Habitat; Fragile Soils	544,460
Total Limited		**1,227,450**
Total Open		**0**

2. Protecting and maintaining cave resources, including wildlife species and habitat in and around caves, by interpreting, restricting, and/or prohibiting nonconforming uses.
3. Enhancing user experiences and opportunities by managing use at levels compatible with resource carrying capacity and protection.
4. Ensuring visitor protection and safety.

Recreational use would be managed to maintain or improve wetland habitat conditions along intensively used streams and reservoirs.

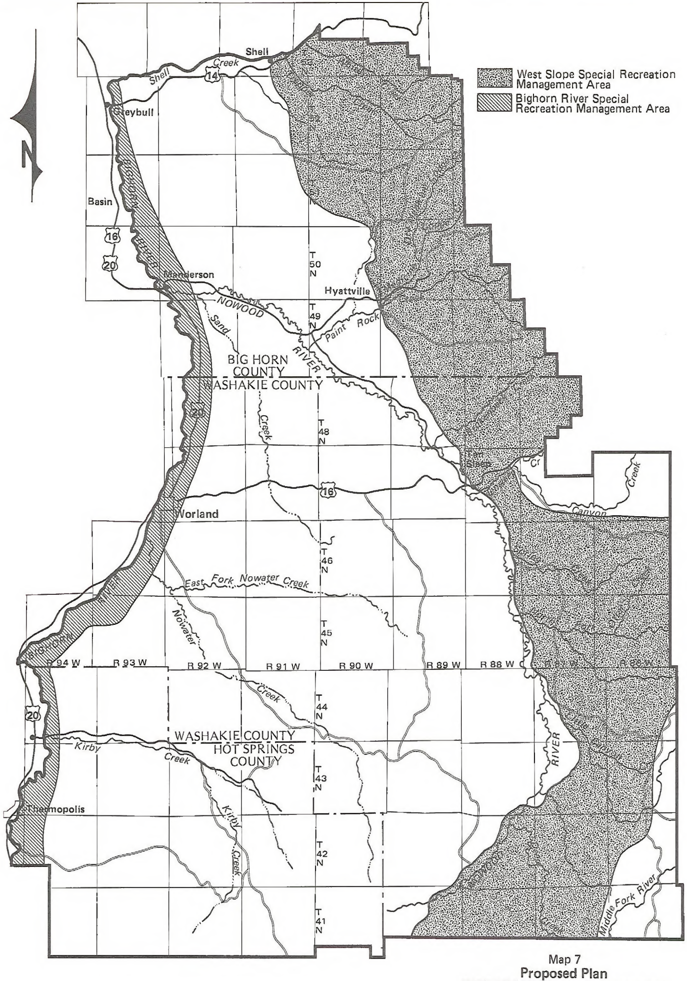
An analysis would be conducted of the existing BLM authorized outfitter/guide activities to evaluate the need for establishing future commercial use limitations and related policies.

Restrictions on recreational use would be limited to applicable ORV restrictions, the use of the caves, and management prescriptions written for special recreation management areas. Protecting cave resources, such as delicate formations, and providing for user safety would enhance the recreation experience. This would be accomplished with controls such as limiting party size, timing of use to avoid crowding, and closing caves to use during periods of high water runoff. Prescriptions written for special recreation management areas would include directing recreational use, protecting important resources, and reducing conflicts with other uses.

Portions of the west slope of the Bighorn Mountains would be designated as a Special Recreation Management Area (SRMA) (Map 7). About 241,000 acres would be designated, including the following west slope canyons: White, Trapper, Medicine Lodge, Dry Medicine Lodge, Paint Rock, Brokenback, South Brokenback, Otter and Deep creeks. The Bighorn River from the Wedding of the Waters downstream to Shell Creek would also be designated as an SRMA. About 59,000 acres would be included in this SRMA. The remainder of the resource area (about 934,000 acres) would be designated as an Extensive Recreation Management Area (ERMA). Activity plans would be prepared for both of the SRMAs and the ERMA to focus management activity on areas of high recreational value, or where conflicts with recreation use occur.

Acquisition of legal and/or physical access would be considered for hunting, fishing, boating, and camping, including in the following areas:

1. Bighorn River, including:
   - Tract 4817—Sulphur Plant,
   - Winchester Diversion,
   - South Flat Bridge,
   - Worland Bridge,
   - Rairden Bridge,
   - Manderson Bridge,
   - Basin Bridge, and
   - Greybull Bridge.



Map 7
Proposed Plan
RECREATION MANAGEMENT
Special Recreation Management Areas
Washakie Resource Management Plan

2. West Slope Canyons, including:
   - Otter Creek,
   - Deep Creek,
   - Trapper Creek,
   - White Creek and the Horse Mountain area,
   - North Brokenback Creek,
   - Canyon Creek, and
   - Little Canyon Creek.
3. Public land tracts along the Nowood River.
4. Intermingled public and private lands in the Upper Nowood River area.

The Billy Miles Habitat Unit Agreement among BLM, the Wyoming Game and Fish Department, and local landowners would be updated and renewed.

Recreational facilities would be considered for development at the following sites:

- Upgrade the access road and develop three additional camp/picnic spaces at the Castle Gardens Scenic Area,
- Facilities necessary for site protection and visitor management at the Middle Fork camping area and the Cherry Creek Stock Driveway crossing of Deep Creek, which may include fire rings, sanitary facilities, fencing, parking areas, road improvements and vehicle barriers, and trail and bridge repair, depending on the needs of the specific site, and
- Facilities necessary for site protection and visitor management at the Trailheads on Otter Creek, Paint Rock Creek, Trapper Creek, and Medicine Lodge Creek.

Cave use permits would be issued to qualified users.

Access to caves would be obtained only if consistent with cave and other resource management objectives.

Additional directional and interpretive signs would be installed to facilitate use in the following areas:

- Major travel routes,
- New access routes or points,
- Upper Nowood River area,
- Laddie Creek area,
- Billy Miles Habitat Management Unit (HMU),
- Renner HMU,
- Medicine Lodge HMU,
- Upper Brokenback area,
- Cherry Creek crossing,
- Otter Creek,
- Middle Fork of Powder River, and
- Castle Gardens.

Visual Resource Management

Resource Management Objective

To minimize adverse visual impacts to the land while maintaining the effectiveness of land use allocations.

Management Actions

Visual Resource Management (VRM) objectives would be considered in the evaluation of all proposals for activities on the public lands in the planning area. Impacts to visual resources would be mitigated through the application of the Wyoming BLM Standard Oil and Gas Lease Stipulations or by mitigations developed through the environmental analysis process. Refer to Table 21.1 and Map 31.1 in this document and the Glossary in the Draft RMP/EIS for details on VRM classes.

Fish and Wildlife Habitat Management

Resource Management Objective

To protect and enhance important fish and wildlife habitats.

Management Actions

The West Slope Habitat Management Plan (HMP) would be expanded to include those portions of the Washakie Resource Area not presently covered by the plan.

The West Slope and Bighorn River Habitat Management Plans would be fully implemented. The projects listed in Table 5 are those identified in the plans. As these plans are completed or modified, or as management objectives change, the numbers and kinds of projects proposed are also likely to change. The projects in Table 5 are indicative of the types of projects that would be undertaken in the future as part of wildlife habitat management.

TABLE 5

PROJECTS IDENTIFIED IN HABITAT MANAGEMENT PLANS

Project Type	Wildlife Habitat Management Plan: West Slope[1]	Wildlife Habitat Management Plan: Bighorn River[1]
Surveying	5	7
Water Wells	10	0
Wildlife Guzzlers	150	0
Riparian Exclosures	75 (750 acres)	6 (310 acres)
Other Fence Projects	70 (10 miles)	5 (5 miles)
Spring Developments	25	0
Reservoir Developments	20	0
Pothole Developments	0	1
Vegetation Plantings and Seedings	0	1
Prescribed Burning	3 (500 acres)	0

[1] Number of Projects

Wetlands would be managed to maintain and improve fish and wildlife habitat through the implementation of changes in livestock grazing systems and specific practices contained in the West Slope and Bighorn River HMPs. Specific practices may include such things as plantings, fencing, using buffer zones, and installing structures to control water levels and prevent siltation. Habitat which would be involved is estimated to include:

- 70 miles of sport fisheries streams,
- 120 miles of perennial streams,
- 450 miles of intermittent/ephemeral streams,
- 80 springs, and
- 170 reservoir sites.

Wildlife habitat management would be accomplished through protection of habitat from destruction or negative impacts, land tenure adjustments, and by habitat development or manipulation. The goal of habitat management would be to increase habitat quality, concurrent with an increase in habitat availability for the majority of wildlife species. Protection of habitat would be accomplished through such methods as improving range condition; withdrawing public land tracts from mineral or other entry; increasing animal security by controlling access; restricting oil and gas exploration and development in important habitat areas; designating seasons of use or reducing disturbances in important wildlife habitat; providing buffer zones; and eliminating competing uses on important areas, such as livestock grazing on parturition areas during calving seasons. Specific numbers, types, and locations of projects and conditions of their development would be prescribed in habitat management plans to solve problems and meet management objectives. Wildlife-related guidelines for vegetation manipulation are listed in Appendix F. Techniques that would be used to develop or manipulate habitat include the following:

- Land acquisition,
- Easement acquisition,
- Farming,
- Prescribed burning,
- Protection or development of water sources,
- Fence construction,
- Fence maintenance,
- Island development,
- Timber management,
- Access management,
- Withdrawals from mineral entry, agricultural entry and disposal,
- Use of surface protection mitigations,

- Construction of artificial structures, and
- Management of other resource activities to conserve forage and protect habitat.

The improvement of existing habitat quality does not include an allocation of forage to wildlife. Allocations of forage to wildlife would be made on a case-by-case basis. An increase in habitat quality would be reflected first in healthier wildlife populations and then in increased numbers of wildlife. This eventually translates into more animals and more opportunities for wildlife-related recreation and helps buffer impacts of other activities on wildlife.

Certain areas would be managed to allow wildlife species to be reintroduced:

- Approximately 126,700 acres in West Slope Canyons would be managed to facilitate the reintroduction of peregrine falcon.
- Approximately 190,700 acres north of Ten Sleep and east of the Nowood River would be managed to facilitate the reintroduction of pronghorn antelope.
- Public lands covered in the Bighorn River HMP between Thermopolis and Kirby would be managed to facilitate the reintroduction of trumpeter swans.
- All Bighorn River HMP tracts would be managed to facilitate the reintroduction of ospreys.
- Public lands on the west slope of the Bighorn Mountains would be managed to facilitate the reintroduction of bighorn sheep.

With the exception of the proposed Spanish Point Karst ACEC, chemical control of pests would be allowed planning area-wide subject to the restrictions identified in Records of Decision on the Northwest Area Noxious Weed Control Program, the Rangeland Grasshopper Cooperative Management Program, findings of the Department of the Interior's Pesticide Program Review, and subsequent programmatic EISs and EAs, to protect food chains, important wildlife habitat and wetlands.

Access (including 4-wheel drive, snowmobile, horseback, and pedestrian access) would be limited in areas of crucial habitats, sensitive species habitats and wetland/riparian habitat. The type of limitation would depend on the kind of resource value being protected.

Threatened and Endangered Wildlife Species

Resource Management Objective

To protect the habitats of threatened and endangered fish and wildlife species to allow the reintroduction or maintenance of populations.

Management Actions

Approximately 536,000 acres that provide habitat or potential habitat for threatened and endangered species (three species—bald eagle, peregrine falcon and black-footed ferret) and sensitive species identified by the State of Wyoming (66 individual species and one group of species—bats) would be protected and managed to benefit those species. (Refer to the Glossary for descriptions of the sensitive species categories. A list of the sensitive species is on file at the Washakie Resource Area Office. Refer, also, to Map 27 in Chapter 3 of the Draft RMP/EIS.) Some of the 536,000 acres could be designated in the future by the U.S. Fish and Wildlife Service as critical habitat for threatened and endangered species.

Whenever activities would be proposed in endangered, threatened, or sensitive species habitat, the BLM would complete either a clearance (for minor actions and projects) or a biological assessment (for major actions or projects requiring an EIS) to determine if approval for the action or project should be granted. Any action that would affect an endangered or threatened species or its habitat would necessitate consultation with the U.S. Fish and Wildlife Service, as required by Section 7 of the Endangered Species Act of 1973, as amended.

Soil and Water Management

Resource Management Objective

To stabilize soils, increase vegetative production and maintain water quality.

Management Actions

Soil and water management rely on existing surface protection stipulations and mitigations which are applied to all proposals for resource use activities. Soil scientists and hydrologists recommend supplemental stipulations for unusual disturbances or special site conditions, and recommend site suitabilities for resource uses, based on soils and water quality data.

About 11,200 acres of BLM-administered public surface or mineral estate related to karst, sinking streams and caves in the Spanish Point area (Map 8 and Appendix G) meet the relevance and importance criteria for potential designation as an Area of Critical Environmental Concern (ACEC), described in 43 CFR 1610.7-2. Thus, by virtue of approval of the RMP, the proposed Spanish Point Karst Area would be designated an ACEC, to emphasize the need for special management of the area and to focus management attention on the resource values of the area which are at risk. Within the boundaries of the proposed ACEC are lands in the national forest system and privately owned surface. The ACEC designation would pertain only to the surface and mineral estate managed by the BLM and to the BLM-administered federal mineral estate under private and forest system lands. The non-BLM-administered surface would not be affected by the ACEC designation.

Management of the 11,200 acres in the proposed Spanish Point Karst ACEC (Map 8) would emphasize watershed protection. Proposed management prescriptions include:

1. All roads and vehicle trails (about 8 miles) in Dry Medicine Lodge Canyon, above the dugway, would be closed and rehabilitated where accelerated erosion is occurring. Additional ORV restrictions would be applied as described in the ORV discussion for this alternative.
2. Logging and heavy equipment use restrictions would be applied on steep slopes and stream buffer zones.
3. The use of insecticides and herbicides would be considered on a case-by-case basis, and if approved, would be conducted under the following guidelines:
    a. Noxious Weed Control:

      (1) Before chemical control of noxious weeds is approved by the BLM, thorough consideration would be given to all forms of physical and biological control, including, but not limited to hand pulling, the use of hand tools, mowing, prescribed burning, livestock grazing, and the use of insects.

      (2) If chemical application is determined to be the most economically acceptable and feasible method of control, the proposal shall detail the areas of infestation, the type and method of chemical control, the proposed location of any mixing facilities or storage tanks around the area, and a plan for containment and clean-up of accidental spills of the chemical.

      (3) Aerial spraying would be discouraged.

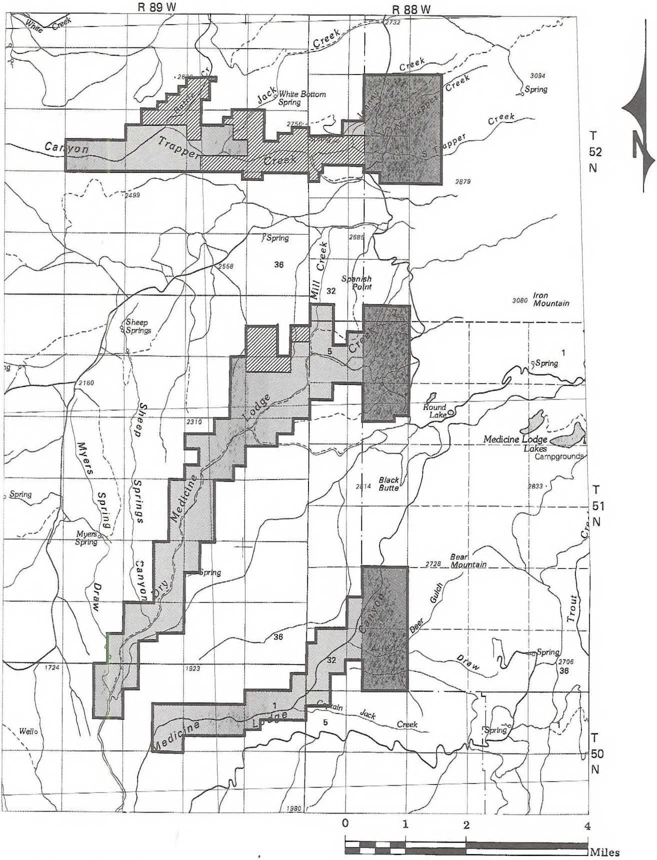
      (4) The applicator would be required to conduct pre- and post-application water quality sampling to confirm that surface water contamination by the pesticide did not occur.

    b. Grasshopper control:

      (1) The preferred grasshopper infestation control method would be the use of the biological control *Nosema locuste*.

      (2) If the proposed Spanish Point Karst ACEC is within the boundaries of an Animal Plant Health Inspection Service (APHIS) designated economic grasshopper infestation zone, it would be flagged as a "no spray" area.
4. The use of silvicultural chemicals would be prohibited.
5. Basal vegetative cover would be managed to maximize (or maintain) ground cover in good or better ecological condition, commensurate with the potential of the ecological site.
6. The federal mineral estate under private surface, national forest system lands, and surface administered by the BLM in the proposed ACEC would be closed to mineral leasing.
7. A withdrawal from the nondiscretionary land laws, including mining claim location under the General Mining Law of 1872, would be pursued for the entire proposed ACEC pursuant to Section 204 of FLPMA. The withdrawal would involve the federal mineral estate under private surface, national forest system lands, and surface administered by the BLM.

The regulation of activities such as logging, livestock grazing, ORV use, and oil and gas development in the proposed ACEC is especially



ACEC Boundary

░ BLM Administered Surface and Subsurface

▒ USFS Surface/BLM Administered Subsurface

▨ Private Surface/BLM Administered Subsurface

Map 8
WATERSHED MANAGEMENT
Spanish Point Karst ACEC
Washakie Resource Management Plan

important to the management of the area because of probable adverse affects from those activities. About 3,000 acres of surface in the Bighorn National Forest and 1,800 acres of surface in private ownership are within the proposed ACEC. In order to protect the values of the proposed ACEC from activities on private lands or on the Bighorn National Forest, the following action would be undertaken: Agreements for cooperative management of surface activities in watersheds on Forest Service and private lands would be obtained where possible. To the extent possible, management prescriptions would be compatible with those proposed for BLM administered public lands.

With the exception of the proposed Spanish Point Karst ACEC, chemical control of pests would be allowed planning area-wide subject to the restrictions identified in Records of Decision on the Northwest Area Noxious Weed Control Program, the Rangeland Grasshopper Cooperative Management Program, and subsequent programmatic EISs and EAs, to reduce the possibilities of water pollution.

Streams in west slope canyons, including White, Trapper, Medicine Lodge, Dry Medicine Lodge, Paintrock, North Brokenback, Canyon, Otter, Little Canyon and Deep Creeks, would be managed to maintain their natural flows. The Wyoming BLM Standard Oil and Gas Lease Stipulations would be used as the basis for determining restrictions to be applied to activities, to prevent watershed deterioriation and sedimentation of these stream systems.

All watershed projects would be maintained on a priority basis. Projects with the highest priority for maintenance, from a watershed standpoint, are the following:

- Seventeen reservoirs or detention dams would be repaired and about 50 acres of habitat associated with their sediment pools would be fenced (Table 6).
- Spreader dikes would be repaired to maintain 900 acres of spreader capacity in the Wild Horse Draw drainage.

Oil and gas exploration wells and geophysical drill holes that produce water may be acquired by the BLM, developed, and managed for livestock, wildlife, or recreation purposes when they meet the criteria listed in Appendix H.

The BLM would file with the Wyoming State Engineer's Office to obtain valid water rights on all water-related projects. All existing projects have been filed on through the Wyoming Water Division No. 3 adjudication. The State is now in the process of adjudicating water rights associated with those projects. The BLM would also apply to the State Engineer's Office for temporary water use permits.

TABLE 6

RESERVOIRS OR DETENTION DAMS IN NEED OF REPAIR TO IMPROVE WATERSHED MANAGEMENT

Location			
Township (North)	Range (West)	Section	Name
50	92	2 NWSE	Lostwell
50	91	15 NWNW	Pete
48	90	30 NESW	Hidden Dome No. 2
47	91	24 NWNW	Kelly's Dee
47	90	19 SWNE	Doc's Tinker
47	90	21 NWSW	Old
47	90	15 NWSE	Otter
47	90	11 NESE	Big Cottonwood
47	89	24 SENW	Tensleep Stock Trail
47	89	35 SENE	Rice No. 1
46	89	30 SWNE	Rattlesnake
46	89	28 NWNW	Rice No. 2
46	88	28 NESW	Kimball Flat
45	89	33 SENW	Buffalo Detention Dam
44	88	3 NWNW	Joe's
44	88	22 NENW	New
44	88	22 NWSW	Dode

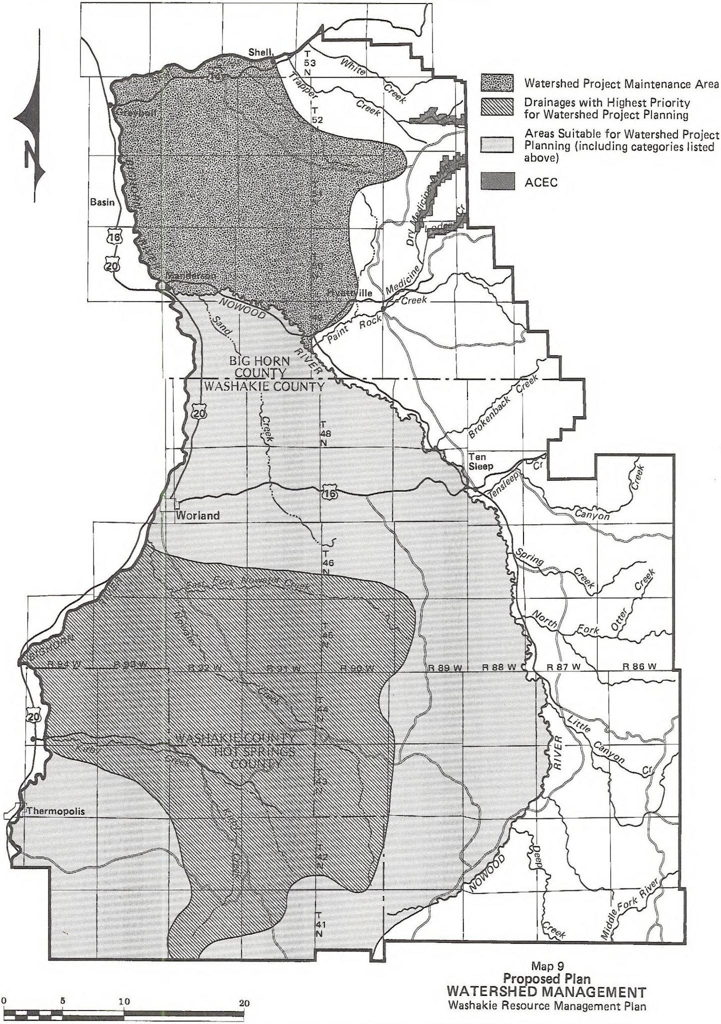
Management actions would emphasize the reduction of soil erosion and sediment yields on approximately 391,000 acres of sensitive watersheds (Map 9). These watersheds are (in descending priority):

- Kirby Creek,
- Nowater Creek, and
- East Fork Nowater Creek.

Management actions would include the use of Best Management Practices (BMPs) (Appendix I in the Draft RMP/EIS) to increase vegetative cover, primarily through changes in livestock management, and to stabilize watersheds with water flow and sediment control structures.

On sites that fail to respond to grazing management, contour furrowing, surface ripping, seeding projects, or a combination of those practices would be applied to improve vegetative cover and condition, if those sites have the potential to respond to the treatments.

- Contour furrowing would be applied on about 15,000 acres of saline upland and



Map 9
Proposed Plan
WATERSHED MANAGEMENT
Washakie Resource Management Plan

saline lowland range sites with slopes of less than 6 percent where soil erosion is evident, particularly near gullies and established drainages.

- Seeding would be applied on about 27,000 acres of loamy, shallow loamy, and sandy range sites with inadequate vegetative cover and lack of adjacent seed sources. Seeding could include both pioneer and native species.

Future water discharges from mining activities, waste water treatment facilities, etc., into drainages and surface waters would be regulated by the National Pollutant Discharge Elimination System (NPDES) permit process. Existing and future discharges of produced water from oil and gas operations on federal leases would be regulated by the NPDES and the Notice to Lessee (NTL) 2B regulations. The following constraints would be applied in all situations:

- NTL 2B produced water disposals would not be allowed in Trapper Creek from the USFS boundary downstream to the west line of Section 21, T. 52 N., R. 89 W.
- NTL 2B produced water disposals would not be allowed in Dry Medicine or Medicine Lodge creeks from the USFS boundary downstream to the confluence of the two creeks.
- NTL 2B produced water disposals that would degrade water quality in streams and reservoirs with sport fishery potential in the West Slope HMP area would not be allowed.

Wildfire suppression restrictions would be applied to areas above sinking stream segments and caves:

- Equipment, such as trucks and bulldozers, would not be allowed to operate within 200 yards of Dry Medicine Lodge, Medicine Lodge or Trapper creeks and other tributaries exhibiting karst characteristics.
- Air-dropped fire retardants would not be allowed within 200 yards of Dry Medicine Lodge, Medicine Lodge and Trapper creeks.

Fire Management

Management Actions

Reclamation and soil stabilization practices would be applied to burned areas. Additionally, livestock grazing would be controlled on burned areas, through the use of such methods as fencing or resting from livestock grazing.

Prescribed fire would be used to achieve management objectives, especially for allotment management plans (AMPs) and habitat management plans (HMPs). Prescribed burning would be conducted in a manner that would avoid violation of the Wyoming Ambient Air Quality Standards.

Full suppression of wildfires, with appropriate restrictions, would occur in wetland/riparian areas.

Full suppression of wildfires would occur on about 703,700 acres (Map 10).

Limited suppression of wildfires would occur on about 530,300 acres.

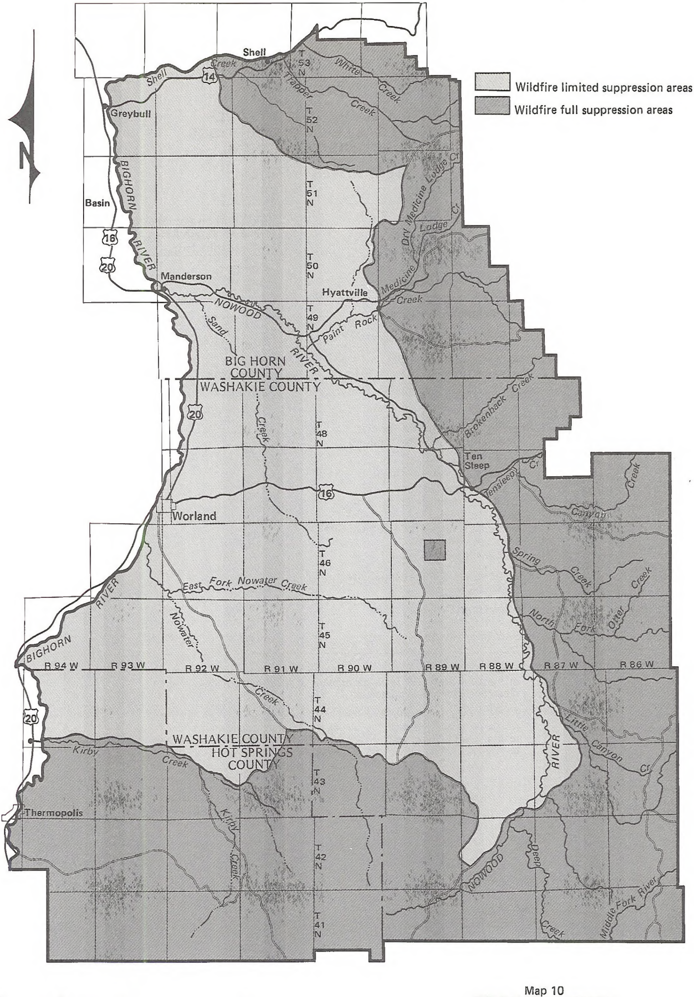
Hazardous Materials Management

Management Actions

Discharges of hazardous materials would be reported to appropriate agencies. These discharges and other regulated hazardous wastes that are discharged on public lands would be secured, disposed of, or otherwise remedied in accordance with Federal Environmental Protection Agency (EPA), BLM, and State regulations in order to protect human health, welfare, and the environment.

Reprinted Tables and Maps from Chapter 2 of the Draft RMP/EIS

As a result of public comments and further review by BLM specialists, modifications have been made in some of the tables and maps originally printed in Chapter 2 of the Draft RMP/EIS but not used as part of the Proposed Plan. In some cases, the modifications dictated the reprinting of the table or map. In other cases, modifications were minor and have been addressed in Table 47. The map numbers and table numbers have not been changed from the Draft RMP/EIS. Following are Tables 9, 10, 11, 13, 14, 15, and 16, and Maps 14, 15, 16.1, 17, and 18.



Map 10
FIRE MANAGEMENT
Washakie Resource Management Plan

TABLE 9

MINERALS MANAGEMENT - ACRES OF OIL AND GAS LEASE RESTRICTIONS BY HYDROCARBON POTENTIAL

ALTERNATIVES A AND B

Category	Hydrocarbon Potential[1] Mineral Estate Acres (Estimated)	
	High to Moderate	Low
Lease Restrictions (General)		
No Lease[2]	0	0
No Surface Occupancy[2]	10,000	119,000
Seasonal Use Restrictions	515,100	439,000
Lease Under Other Stipulations	436,900	83,000
Total	**962,000**	**641,000**
	(Note: Numbers rounded)	
Specific Areas with No Surface Occupancy Lease Restrictions		
West Slope Canyons		83,500
Middle Fork Powder River		900
T & E Species Nesting Area	250	
Castle Gardens Campground	110	
Bates Battlefield		1,040
Medicine Lodge Archeological Site		100
Sage Grouse Leks	9,450	4,660
Elk Calving Areas		17,600
Specific Areas with Seasonal Use Restrictions		
Other Sage Grouse Habitat	337,000	155,100
Crucial Elk Winter Range	4,800	120,000
Elk Winter Range	173,300	163,500

[1] Refer to "Evaluation Criteria for Hydrocarbon Potential" in Chapter 1 of the Draft RMP/EIS for a description of thee methodology used to determine hydrocarbon potential.

[2] The "closed to leasing" and the "no surface occupancy" stipulations would be phased in over the life of the plan by application of those restrictions on leases as they are issued. These stipulations would not be applied retroactively to existing leases.

TABLE 10

MINERALS MANAGEMENT - GEOPHYSICAL EXPLORATION RESTRICTIONS
(Estimated Surface Acres)

ALTERNATIVE A

Category Descriptions	Hydrocarbon Potential High	Low
Closed[1]	0	0
Limited[2]		
No Surface Occupancy	500	73,500
Seasonal No Surface Disturbance (*See Table 9 for further breakdown*)	407,000	354,000
Total Limited	**407,500**	**427,500**
Total Open	**333,000**	**64,500**

NOTE: All geophysical exploration would be subject to ORV use designations.

[1] "Closed" applies to areas that are not open for leasing of oil and gas or are closed to ORV use.

[2] "Limited" includes areas open for leasing of oil and gas but subject to Wyoming BLM Standard for Surface Disturbing Activities including "no surface occupancy" or Mitigation Measures surface disturbance restrictions.

TABLE 11

MINERALS MANAGEMENT - GEOPHYSICAL EXPLORATION RESTRICTIONS
(Estimated Surface Acres)

ALTERNATIVE B

Restriction	Hydrocarbon Potential High to Moderate	Hydrocarbon Potential Low
Closed[1]		
T&E Species Habitat	250	0
Total Closed	**250**	**0**
Limited[2]		
Permitted/Licensed Use		
West Slope Canyons		94,700
Existing Roads & Trails		
Castle Gardens	110	
Wetlands	3,000	
Time or Season of Use		
Medicine Lodge		12,000
Designated Roads & Trails		
Middle Fork		900
Upper Nowood		32,000
Laddie Creek		4,700
Designated Roads & Trails and/or Season of Use		
Crucial Wildlife Habitat or Fragile Soils	404,000	121,200
Total Limited	**407,240**	**202,000**
Total Open	**333,000**	**20,000**

NOTE: All geophysical exploration would be subject to ORV use designations (see Table 12 in the Draft RMP/EIS).

[1] "Closed" applies to areas that would be closed to the leasing of oil and gas or that would be closed to ORV use.

[2] "Limited" includes areas open for leasing of oil and gas but subject to restrictions based on the Wyoming BLM Standard Oil and Gas Lease Stipulations, including "no surface occupancy" or seasonal use restrictions.

TABLE 13

MINERALS MANAGEMENT - ACRES OF OIL AND GAS LEASE RESTRICTIONS BY HYDROCARBON POTENTIAL

ALTERNATIVE C

	Hydrocarbon Potential[1] Mineral Estate Acres (Estimated)	
Category	High Moderate	Low
Lease Restrictions (General)		
Closed to Leasing[2]	0	0
No Surface Occupancy[2]	14,000	239,000
Seasonal Use Restrictions	511,000	319,000
Lease Under Other Stipulations	437,000	83,000
Total	**962,000**	**641,000**
	(Note: Numbers rounded)	
Specific Areas with No Surface Occupancy Lease Restrictions		
Spanish Point Karst ACEC		11,200
West Slope Canyons		83,500
Middle Fork Powder River		900
T&E Species Nesting Area	250	
Castle Gardens Campground	110	
Bates Battlefield		1,040
Medicine Lodge Archeological Site		100
Sage Grouse Leks	9,200	3,900
Elk Calving Areas		18,600
Crucial Elk Winter Range	4,800	120,000
Specific Areas with Seasonal Use Restrictions		
Other Sage Grouse Habitat	337,000	155,100
Elk Winter Range	173,300	163,500

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[1] Refer to "Evaluation Criteria for Hydrocarbon Potential" in Chapter 1 of the Draft RMP/EIS for a description of the methodology used to determine hydrocarbon potential.

[2] The "closed to leasing" and the "no surface occupancy" stipulations would be phased in over the life of the plan by application of those restrictions on leases as they are issued. These stipulations would not be applied retroactively to existing leases.

TABLE 14

MINERALS MANAGEMENT - GEOPHYSICAL EXPLORATION RESTRICTIONS
(Estimated Surface Acres)

ALTERNATIVE C

Restriction	Hydrocarbon Potential High to Moderate	Low
Closed[1]		
Spanish Point Karst ACEC		6,500
T&E Species Nesting Areas	250	
Total Closed	**250**	**6,500**
Limited[2]		
Permitted/Licensed Use		
West Slope Canyons		83,500
Existing Roads and Trails		
Castle Gardens	110	
Wetlands	3,000	
Crucial Wildlife Habitat; Fragile Soils	581,130	52,400
Designated Roads and Trails and/or Time and Season of Use		
Medicine Lodge H. U.		4,300
Upper Nowood	32,300	
Laddie Creek		4,700
Middle Fork		900
Crucial Wildlife Habitat; Fragile Soils	123,200	339,700
Wetlands		2,000
Total Limited	**739,740**	**487,500**
Total Open	**0**	**0**

NOTE: All geophysical exploration would be subject to ORV use designations (see Table 8 in the Draft RMP/EIS).

[1] "Closed" applies to areas that would be closed to the leasing of oil and gas or that would be closed to ORV use.

[2] "Limited" includes areas open for the leasing of oil and gas but subject to restrictions based on the Wyoming BLM Standard Oil and Gas Lease Stipulations, including "no surface occupancy" or seasonal use restrictions.

TABLE 15

MINERALS MANAGEMENT - ACRES OF OIL AND GAS LEASE RESTRICTIONS BY HYDROCARBON POTENTIAL

ALTERNATIVE D

Category	Hydrocarbon Potential[1] Mineral Estate Acres (Estimated) High to Moderate	 Low
Lease Restrictions (General)		
Closed to Leasing	0	11,200
No Surface Occupancy[2]	371,600	412,500
Seasonal Use Restrictions	0	0
Lease Under Other Stipulations	590,400	217,300
Total	**962,000**	**641,000**
	(Note: Numbers rounded)	
Specific Areas with "No Surface Occupancy" Lease Restrictions		
West Slope Canyons		83,500
Middle Fork Powder River		900
T&E Species Nesting Area	250	
Castle Gardens Campground	110	
Bates Battlefield		1,040
Medicine Lodge Archeological Site		100
Other Sage Grouse Leks	9,200	3,900
Elk Calving Areas		17,600
Crucial Elk Winter Range	4,800	120,000
Sage Grouse Habitat	183,900	21,900
Elk Winter Range	173,400	163,500

[1] Refer to "Evaluation Criteria for Hydrocarbon Potential" in Chapter 1 of the Draft RMP/EIS for a description of the methodology used to determine hydrocarbon potential.

[2] The "closed to leasing" and the "no surface occupancy" stipulations would be phased in over the life of the plan by application of those restrictions on leases as they are issued. These stipulations would not be applied retroactively to existing leases.

TABLE 16

MINERALS MANAGEMENT - GEOPHYSICAL EXPLORATION RESTRICTIONS
(Estimated Surface Acres)

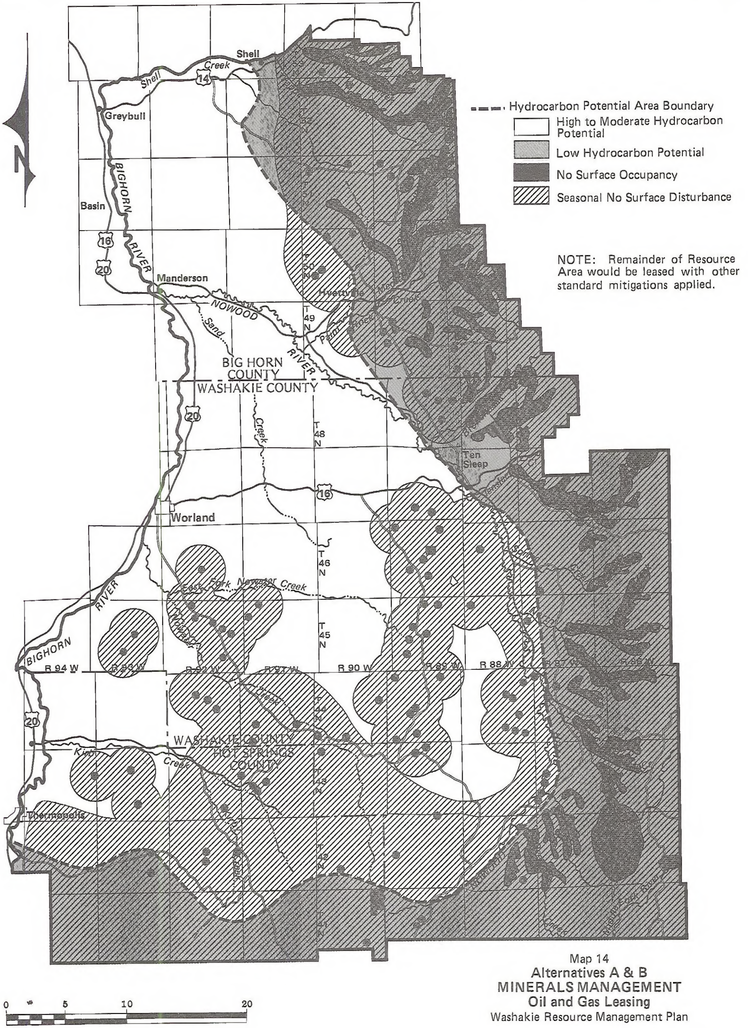
ALTERNATIVE D

Restriction	Hydrocarbon Potential High to Moderate	Low
Closed[1]		
Spanish Point Karst ACEC		6,500
T&E Species Nesting Areas	250	
Semi-Primitive Nonmotorized	50,000	63,000
Total Closed	**50,250**	**69,500**
Limited[2]		
Permitted/Licensed Use		
West Slope Canyons		83,500
Existing Roads and Trails		
Castle Gardens	110	
Wetlands	3,000	
Crucial Wildlife Habitat; Fragile Soils	531,460	56,000
Designated Roads and Trails and/or Time and Season of Use		
Medicine Lodge H. U.	4,300	
Upper Nowood	32,300	
Laddie Creek		4,700
Middle Fork		7,000
Crucial Wildlife Habitat; Fragile Soils	123,200	266,600
Wetlands		2,000
Total Limited	**690,070**	**424,100**
Total Open	**0**	**0**

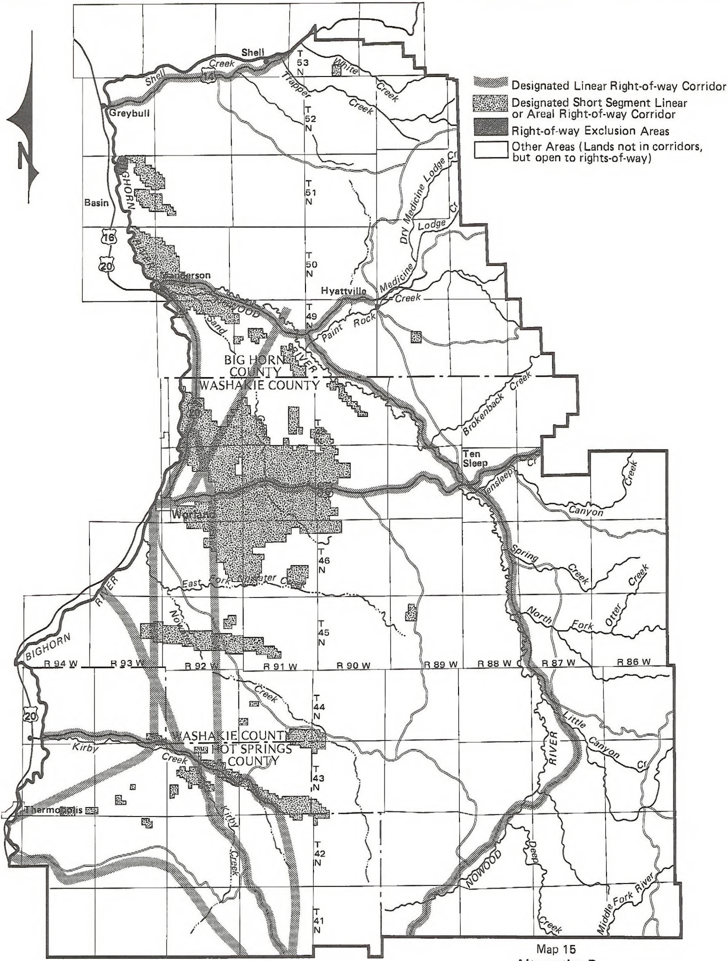
NOTE: All geophysical exploration would be subject to ORV use designations (see Table 17 in the Draft RMP/EIS).

[1] "Closed" applies to areas that would be closed to the leasing of oil and gas or that would be closed to ORV use.

[2] "Limited" includes areas open for leasing of oil and gas but subject to restrictions based on the Wyoming BLM Standard Oil and Gas Stipulations, including "no surface occupancy" or seasonal use restrictions.



Map 14
Alternatives A & B
MINERALS MANAGEMENT
Oil and Gas Leasing
Washakie Resource Management Plan

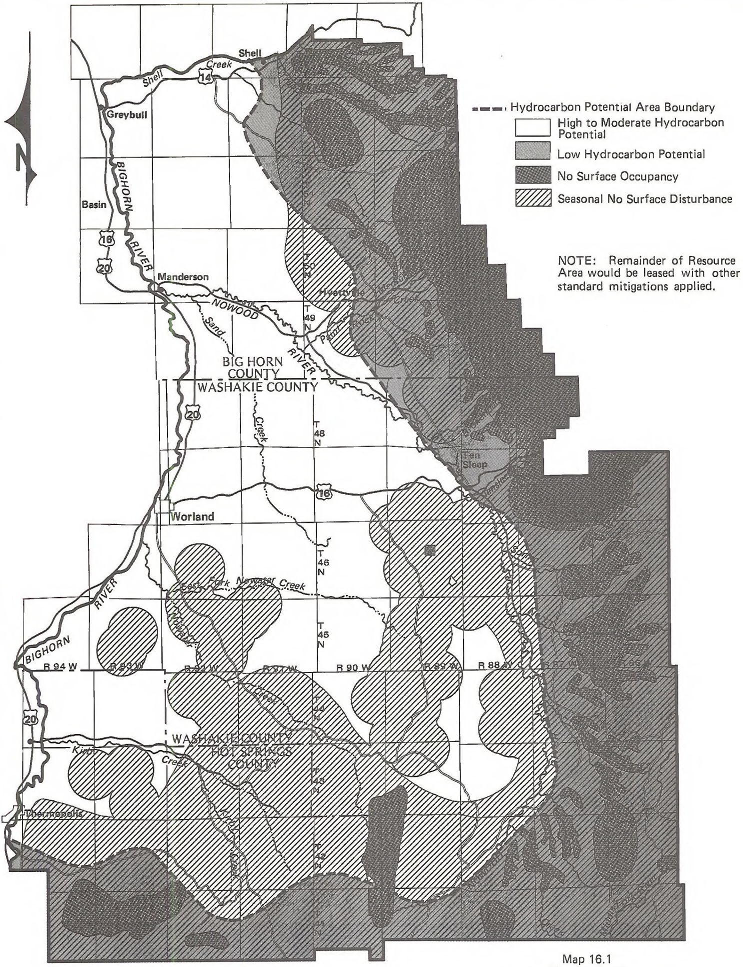


Map 15

Alternative B

LANDS AND REALTY MANAGEMENT CORRIDOR DESIGNATION

Washakie Resource Management Plan



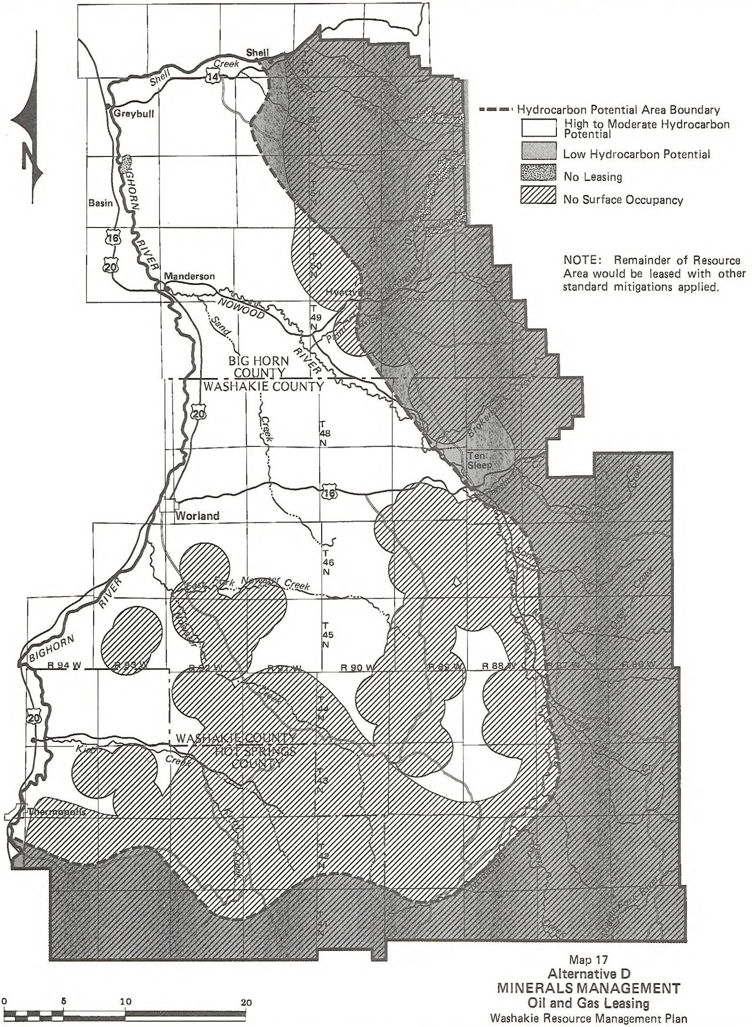
Map 16.1

Alternative C

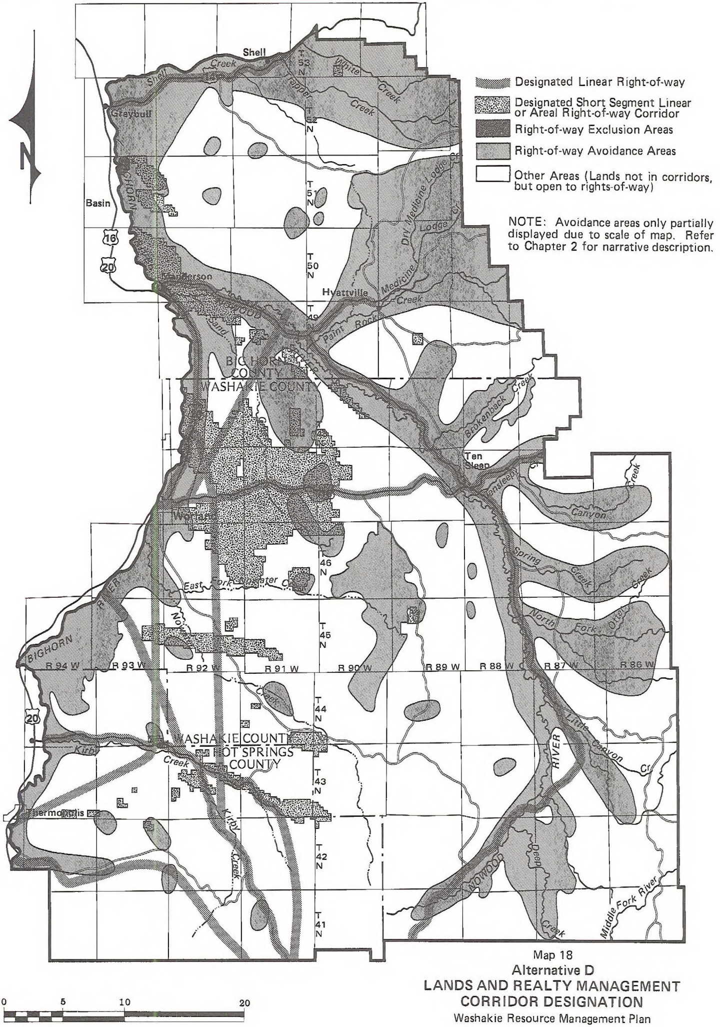
MINERALS MANAGEMENT

Oil and Gas Leasing

Washakie Resource Management Plan



Map 17
Alternative D
MINERALS MANAGEMENT
Oil and Gas Leasing
Washakie Resource Management Plan



Map 18

Alternative D

LANDS AND REALTY MANAGEMENT

CORRIDOR DESIGNATION

Washakie Resource Management Plan

3 Affected Environment

With the exceptions of Table 19 and Maps 20, 21, 30, and 33, Chapter 3 of the Draft RMP/EIS has not been reprinted. Modifications in tables and maps printed in Chapter 3 resulted from public comments or review by BLM specialists. In some cases, the modifications dictated the reprinting of the table or map. In other cases, modifications were minor and have been addressed in Table 47. Table 21.1 and Map 31.1 are new, resulting from further review by BLM specialists.

TABLE 19

USES AND CLASSIFICATIONS OF DESIGNATED STREAMS IN THE WASHAKIE RMP AREA

Name	Uses[1]	DEQ Classification[2]	WG&FD Stream Classification[3]
Kirby Creek			
Above Kirby Creek Oil Field	I, W&L, CWF	II	4
Below Kirby Creek Oil Field	I, W&L	IV	
Lake Creek	W&L	II	4
Nowater Creek	W&L	IV	4
Mud Creek	W&L	IV	5
Nowood River			
Headwwaters to Big Trails	I, W&L, CWF, SA, SBC	II	3
Big Trails to Ten Sleep	I, W&L, CWF	II	3
Ten Sleep to Paint Rock Creek	I, W&L, CWF	II	3
Paint Rock Creek to Mouth	I, W&L, WWF, CWF	II	4
Deep Creek	I, W&L, CWF, SA	II	3
Lost Creek	I, W&L, CWF, SA	II	3
Boxelder Creek	I, W&L, CWF, SA	II	3
Otter Creek	I, W&L, CWF, SA	II	3
Spring Creek	I, W&L, CWF, SA	None	3
Tensleep Creek & Tributaries			
Above Forest Boundary	CWF, SBC	II	3
Below Forest Boundary	W&L, SA, CWF, I	II	2
Brokenback Creek	I, W&L, CWF,SA	II	4
Paint Rock Creek			
Above Forest Boundary	CWF, SA, SBC, W&L	II	3
Below Forest Boundary	I, SA, W&L, CWF, SBC	II	2
Shell Creek			
Above Forest Boundary	CWF, SA, SBC, W&L	II	3
Below Forest Boundary	PWS, I, CWF, W&L	II	3
Trapper Creek			
Above BLM Boundary	SA, CWF, W&L	II	3
Below BLM Boundary	I, W&L, CWF	II	4

[1] **Uses**

PBC - Primary Body Contact	I - Irrigation
SBC - Secondary Body Contact	IWS - Industrial Water Supply
CWF - Cold Water Fishery	PWS - Public Water Supply
WWF - Warm Water Fishery	SA - Stream Aesthetics
W&L - Wildlife & Livestock Watering	

[2] **Department of Environmental Quality Classification**

Class I Waters — Those designated waters which, due to their beneficial values, shall be maintained at their existing quality.

Class II Waters — Waters capable of or presently supporting game fish.

Class III Waters — Waters capable of or presently supporting non-game fish.

Class IV Waters — Waters not capable of supporting fish.

[3] **Wyoming Game and Fish Department Stream Classification**

Class 2 — Very good trout waters—fisheries of statewide importance.

Class 3 — Important trout waters—fisheries of regional importance.

Class 4 — Low production waters—fisheries frequently of local importance but generally incapable of sustaining substantial fishing pressure.

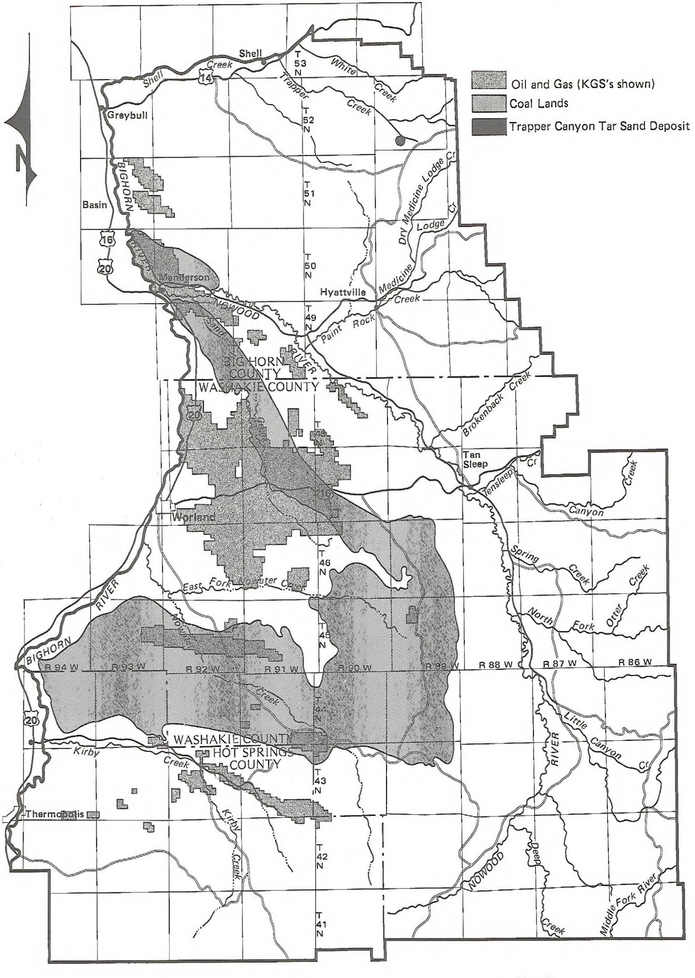
Class 5 — Very low production waters—often incapable of sustaining a fishery.

TABLE 21.1

VISUAL RESOURCE MANAGEMENT CLASSES

Class	Acres[1]
II	255,000
III	274,000
IV	1,429,000
Total	**1,958,000**

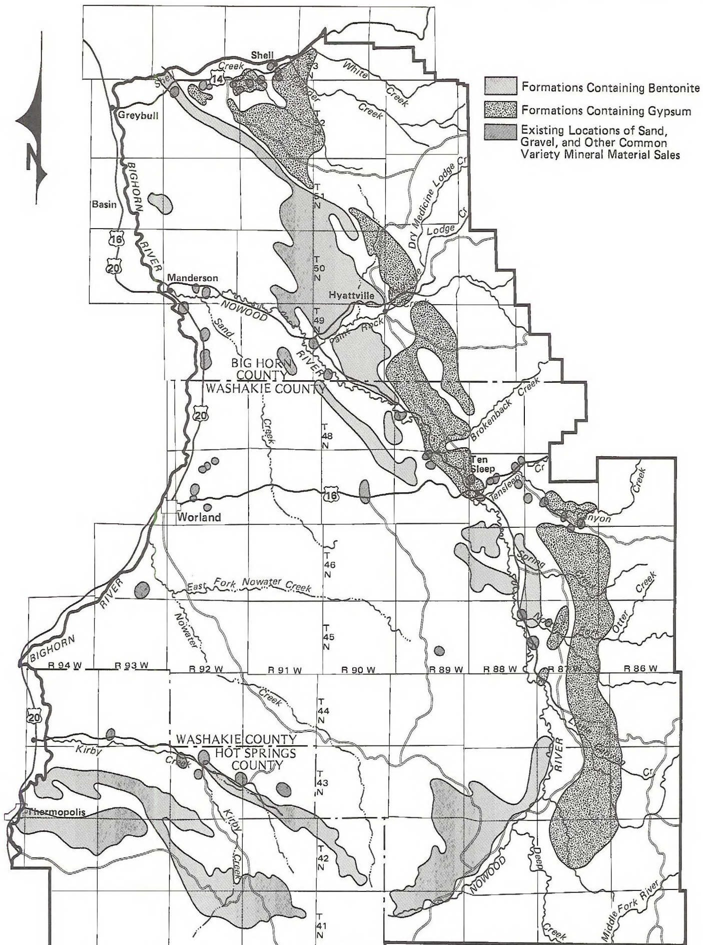
[1] Acreages are approximate and include all surface ownerships in the planning area. All surface ownerships are included because landscapes transcend ownership or political boundaries. It is generally not possible to differentiate between ownerships during the inventory of VRM classes. The use of VRM would apply only to management actions on BLM administered public lands.



Map 20

KNOWN LEASABLE MINERAL RESOURCES

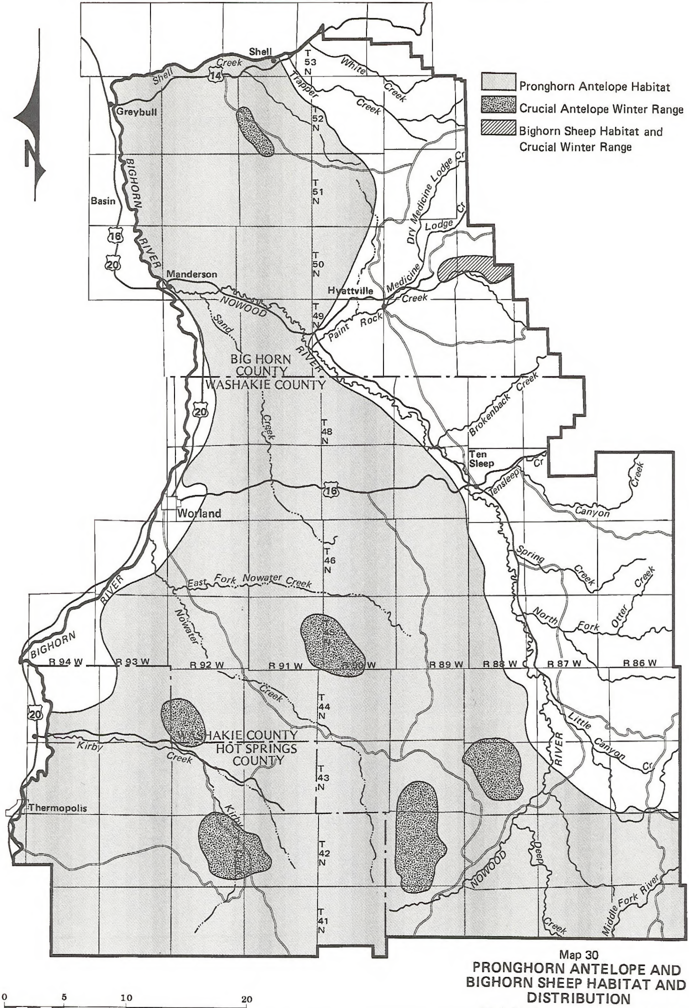
Washakie Resource Management Plan



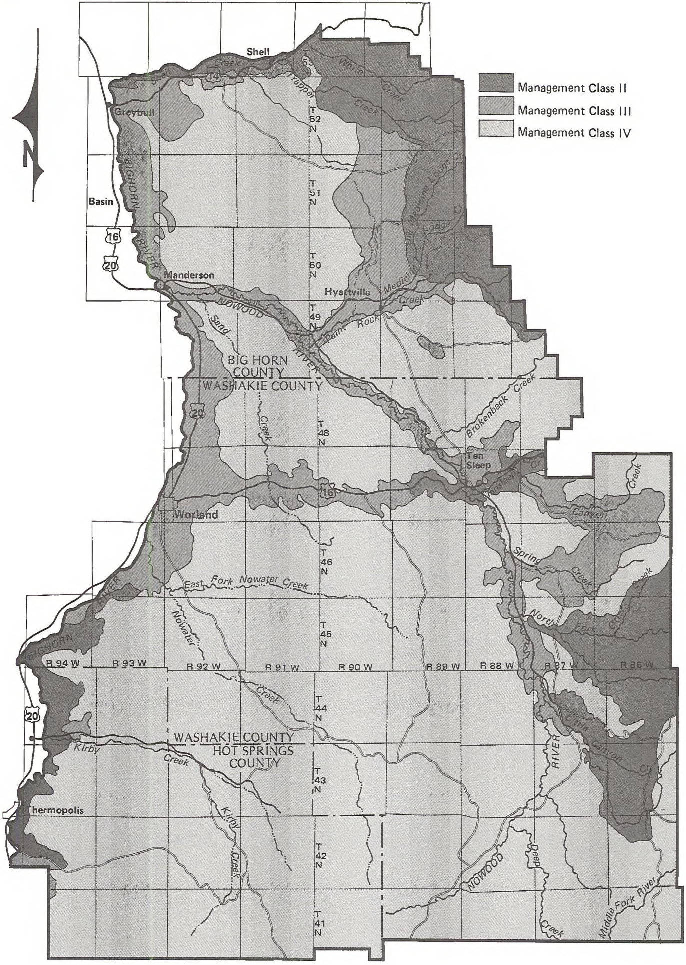
Map 21

LOCATABLE AND SALABLE MINERAL RESOURCES

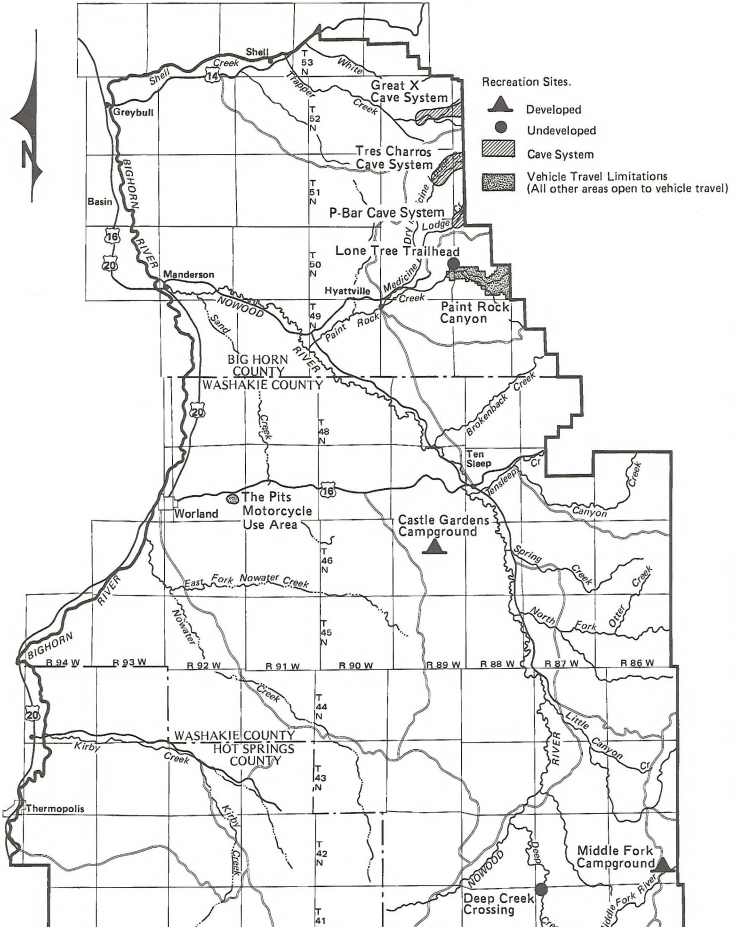
Washakie Resource Management Plan



Map 30
PRONGHORN ANTELOPE AND BIGHORN SHEEP HABITAT AND DISTRIBUTION
Washakie Resource Management Plan



Map 31.1
VISUAL RESOURCE MANAGEMENT
Washakie Resource Management Plan



Map 33

RECREATION OPPORTUNITIES AND VEHICLE TRAVEL LIMITATIONS

Washakie Resource Management Plan

4 Environmental Consequences

As a result of public comment, Table 26 from Chapter 4 of the Draft RMP/EIS has been reprinted. The remainder of Chapter 4 has not been reprinted.

TABLE 26

ESTIMATED SOIL LOSS BY GENERAL SOILS UNITS
(Tons Per Year)

PROPOSED ALTERNATIVE

	Soil Unit								Total Soil Loss (Tons)
Resource Use Activity	**M3**	**M2**	**M1**	**B1**	**B2**	**B3**	**B4**	**B5**	
Recreation Uses	9,240	101,430	53,900	52,500	5,700	11,870	12,700	82,060	329,400
Range Management									
Range Developments	640	6,550	5,960	2,300	5,500	9,180	12,240	7,150	49,520
Livestock Grazing	5,100	54,200	51,140	24,030	43,150	76,000	112,800	59,170	425,590
Minerals Activities	0	0	0	17,000	29,000	49,000	61,300	37,900	194,200
Timber Harvest & Forest Management	0	1,850	1,800	0	0	0	0	0	3,650
Lands	0	0	0	500	700	1,300	1,600	900	5,000
Wildlife Mgmt. & Habitat Improvements (Short-Term)	0	0	50	70	50	50	60	60	340
Fire Management	20	170	150	0	0	0	300	160	800
Total Accelerated	15,000	164,200	113,000	96,400	84,100	147,400	201,000	187,400	1,008,500
Estimated Natural	4,000	98,000	100,000	120,000	185,000	280,000	510,000	160,000	1,457,000
Total Erosion	**19,000**	**262,200**	**213,000**	**216,400**	**269,100**	**427,400**	**711,000**	**347,400**	**2,464,500**

5 Consultation and Coordination

INTRODUCTION

Both the Draft and Final Washakie RMP/EIS documents were prepared by an interdisciplinary team of specialists from the Washakie Resource Area and the Worland District Office. Reviews for accuracy and consistency were provided by both the district office and state office staffs.

Consultation, coordination, and public involvement have occurred throughout the process through public meetings, informal meetings, individual contacts, news releases, and *Federal Register* notices.

Initial steps in the process began in 1982 with the development of a preparation plan. Other early efforts included research, inventory, analysis, and interagency coordination.

PUBLIC PARTICIPATION

A public participation plan was prepared to ensure that the public would have numerous opportunities to be actively involved in the planning and environmental process. Both formal and informal input have been encouraged and used.

Questionnaires were sent to approximately 650 persons in January 1983. The purpose of the mailing was to identify the issues in the resource area. Ninety-two responses were received. The following discussion on issues-related attitudes is based on information received from those who took the initiative to make their views known via the issue questionnaire. The majority of the responses (other than those from mineral companies) were received from area residents. It should be noted that the majority of the respondents expressed views on more than one issue. On most issues a wide variety of opinions was expressed. Many respondents indicated they favored multiple use but interpretation of what that meant differed.

Half of the responses contained comments regarding energy/mineral exploration and/or development. The comments covered a wide range of attitudes from "exploration and development is the high priority and all lands should be open"; to "resources need to be developed slowly and carefully in accordance with environmental regulation and sound reclamation practices"; to "energy and mineral exploration and/or development is the lowest priority and should be minimized." Most of the responses fell into the middle ranges - the resources are needed and must be developed, but in a careful, prudent manner. Concerns included conflicts with wildlife, proper reclamation, conflicts with ranching, and not precluding development with unnecessary restrictions.

Over 40 percent of the people who responded to the issues brochure mentioned livestock concerns. Of these, half indicated livestock grazing on federal land was a priority. Associated comments included: lessees are good land stewards; range improvements are needed for livestock; soil and water conservation needs improvement; livestock grazing is part of multiple use; wildlife numbers should be controlled; and the rancher should not be the only user who pays to use the range. The other half of the respondents who mentioned livestock concerns indicated that overgrazing and/or conflicts between wildlife and livestock were problems. (See following paragraph.) A few respondents indicated that in their opinion, the range is presently managed solely for livestock.

Approximately 40 percent of the people who responded to the issues questionnaire mentioned concerns regarding wildlife and/or wildlife habitat. These concerns centered around big game winter range, wildlife conflicts with livestock and wildlife conflicts with mineral exploration and development. Specific conflicts with livestock grazing included excessive or poorly timed livestock use, degradation of riparian areas and poorly planned range improvements. Other less frequently mentioned wildlife concerns included threatened and endangered (T&E) species, critical game bird habitat and fisheries. Two respondents indicated wildlife numbers need to be controlled because they conflict with livestock.

About one-third of the respondents made comments regarding recreation. These comments frequently dealt with recreation access and ORV use, and were some of the most varied of all the responses. The access comments ranged from "more access is needed" to "access needs to be limited from what is available now" with most respondents falling at the "need more access" end of the continuum.

Specific comments included "federal lands need to be signed so their location is obvious" and "private landowners will not let recreationists/humans cross their land to get to public lands." A few respondents felt off-road vehicle (ORV) use was very important while others felt ORV use should be limited or was a low priority. Quite a few respondents indicated recreation was a high priority use of the public lands and quality recreation areas should be maintained.

Approximately one-fourth of the respondents indicated a concern for soil and water conservation with several saying it should have the highest priority. Specific concerns included riparian habitat, water recharge, instream flows for fisheries and erosion. The following were seen as contributors to soil and water problems: overgrazing, ORV use and poor reclamation of disturbed lands.

About 10 percent of the respondents commented on the trading or selling of public lands. A few indicated that small isolated tracts should be sold to adjacent landowners because they are difficult to administer economically and encourage hunters to trespass. Others feel that lands should not be sold but traded for consolidation purposes. Still others feel these small isolated tracts should not be sold or traded because they may contain riparian areas of value to wildlife, or may contain valuable cultural resources. Several individuals felt public land should be made available for community expansion.

About 10 percent of the respondents commented generally or specifically about wilderness designations with comments being nearly evenly divided for and against. Specific comments included "overgrazing is destroying some WSAs" and "Trapper Canyon should be designated a Resource Natural Area."

In February 1983, a notice of intent to prepare a plan was published in the *Federal Register*.

In June of 1984, a news release was issued and a notice mailed to 813 individuals, companies, groups, and governmental agencies to solicit views and comments on a set of proposed planning criteria.

In November 1984, a letter requesting comment was mailed to 134 entities considered to have interests in mineral resources. A *Federal Register* notice and news release followed in February, 1985, requesting comments specifically from anyone who may have interests in the coal resources of the Washakie Resource Area.

The Worland District Advisory Council has been kept apprised of the RMP progress and their comments and recommendations have been solicited and used. The members of the Advisory Council toured a portion of the Washakie Resource Area during a meeting on August 20, 1986. The tour was designed to provide examples of concerns identified in the plan. In two subsequent meetings, on December 12, 1986, and March 10, 1987, the Council discussed the Washakie RMP/EIS and the Washakie Wilderness EIS.

Each operator of a grazing allotment has been contacted either in person or in writing to discuss the categorization of his allotment.

Formal and informal meetings have been held with many members of the ranching and minerals industries and with other interest groups and agencies. A summary of comments generated from these meetings is on file in the Washakie Resource Area Office.

As part of the ongoing activity in consultation and coordination, the BLM prepared a biological assessment for threatened and endangered species. The BLM shared the results of the assessment with the U.S. Fish and Wildlife Service, as required by Section 7 of the Endangered Species Act of 1973, as amended.

The ninety day public comment period on the Draft RMP/EIS and the Draft Wilderness EIS ended February 19, 1987. We received 169 written and two telephone comments during the period, of which 39 were directed toward the RMP/EIS.

During the comment period, a formal public hearing was held, covering both the Draft RMP/EIS and the Draft Wilderness EIS. Eighteen members of the public attended the hearing, and five presented testimony on the RMP/EIS.

CONSISTENCY

Coordination with other agencies and consistency with other plans were accomplished through frequent communications and cooperative efforts between the BLM and involved federal, state, and local agencies and organizations.

The Wyoming Governor's Clearing House was supplied with numerous copies of the draft document for review to ensure consistency with the state's ongoing plans. County land-use plans for Big Horn, Washakie and Hot Springs counties have been reviewed by the RMP team to ensure consistency. Meetings have been held with the respective county planners and commissioners to promote greater understanding of goals, objectives, and resources of both the counties and the BLM. The Forest Service draft plan for the Bighorn National Forest has been reviewed and comments provided to the Forest Supervisor.

CONSULTATION/ COORDINATION

Members of the RMP team have consulted formally or informally with numerous agencies, groups, and individuals in the RMP development process. The following list is representative of the businesses, agencies, organizations, and individuals who have indicated an interest in the Washakie RMP and who have been contacted during the planning process. This list is not inclusive. A complete list is on file at the office of the Washakie Resource Area.

Required Reviewers

U.S. Department of the Interior
    Bureau of Land Management (340), Washington, D.C.
    Bureau of Land Management (931), Cheyenne, WY.
    Office of Environmental Project Review, Denver, CO.
    National Park Service, Div. of Env. Compliance (WASO 762), Washington, D.C.
    U.S. Fish and Wildlife Service, Chief, Div. Env. Coord., Washington, D.C.
    Minerals Management Service, Offshore Env. Assessment Div., Washington, D.C.
    Bureau of Reclamation, Div. of Env. Affairs, Washington, D.C.
    Bureau of Mines, Mineral Data Anal. (MS-5000), Washington, D.C.
    U.S. Geological Survey, National Center (423), Reston, VA.
U.S. Air Force
    HQ USAF/LEER, Washington, D.C.
    HQ SAC/DEPU, Offut AFB, NE.
    HQ-US LEVX, Office of Env. Planning, Bolling AFB, Washington, D.C.
    Asst. Secy. of the Air Force, Install. Env. and Safety, Pentagon, Admiralty, VA.
U.S. Army Corps of Engineers
    Chief, Planning Division, Omaha, NE.
    Chief, Planning Division, Portland, OR.
Department of Energy (EP-36), Washington, D.C.
Nuclear Regulatory Commission, Bethesda, MD.
Environmental Protection Agency, Denver, CO.
State of Wyoming, Wyoming State Clearing House, Cheyenne, WY.

Other Reviewers

Federal Government

Department of Agriculture
    Soil Conservation Service
    U. S. Forest Service
    Farmers Home Administration
Department of the Interior
    Bureau of Indian Affairs
    Bureau of Reclamation
    National Park Service
    U. S. Fish & Wildlife Service
Environmental Protection Agency
Federal Highway Administration
USDE-Western Area Power Administration

State of Wyoming

Office of the Governor
State Board of Land Commissioners
University of Wyoming
Wyoming Conservation Commission
Wyoming Department of Environmental Quality
Wyoming Department of Agriculture
Wyoming Game & Fish Department
Wyoming Geological Survey
Wyoming Highway Department
Wyoming Recreation Commission
Wyoming State Clearing House
Wyoming State Engineer
Wyoming Water Development Commission

Indian Tribes

Arapaho Business Council
Shoshone Business Council

County Government

Big Horn County Commissioners
Hot Springs County Commissioners
Washakie County Commissioners

CONSULTATION AND COORDINATION

Federal Legislators

The Honorable Richard Cheney
The Honorable Alan K. Simpson
The Honorable Malcolm Wallop

State Legislators

Office of Representatives (2), Big Horn County
Office of Representative, Hot Springs County
Office of Representative, Washakie County
Office of Senator, Big Horn County
Office of Senator, Hot Springs & Washakie Counties

Organizations

American Wilderness Alliance
Basin Sportsmens' Club
Earth First!
Foundation for North American Wild Sheep
Girl Scout National Center West
Hot Springs County Sportsmens' Club
Isaac Walton League of America
National Audubon Society
National Outdoor Leadership School
National Wetlands Technical Council
National Wildlife Federation
Natural Resource Defense Council
Nature Conservancy
Park County Resource Council
Petroleum Association of Wyoming
Professional Outfitters & Guides of Wyoming
Public Lands Council
Rocky Mountain Oil & Gas Association
Sierra Club
Thermopolis Pick & Trowel Club
Wilderness Society
Willwood Irrigation District
Wyoming Heritage Society
Wyoming Outdoor Council
Wyoming Outfitters Association
Wyoming Mining Association
Wyoming State Mineral & Gem Society
Wyoming Wildlife Federation
Wyoming Wool Growers Association

Businesses

Amerada-Hess
American Natural Gas Production Company
Aminoil USA, Incorporated
Amoco Production Company
Anderson Oil Company
Anschutz Corporation
Apache Corporation
Archeological Consultants, Incorporated
Arkla Exploration
Atlantic Richfield Company
Beard Oil Company
Benton Clay Company
Beta Exploration
Big Horn Land Title Company
Big Horn Lumber Company, Incorporated
Big Horn REA
Bishop Geological Services
Blackburn Drilling
Boydston & Franzen Well Service
Bronco Oil & Gas Company
Buckhorn Petroleum Company
Canyon Concrete & Excavating, Incorporated
Carneal Construction
Carver Excavation
Carter Oil Company
Champlin Petroleum Company
Cherokee Exploration
Chevron USA, Incorporated
Coastal Oil & Gas Corporation
Cody Lumber Company
Conoco, Incorporated
Cork Petroleum Company
Coronado Oil Company
Coseka Resources Ltd.
Cowboy Timber Treating, Incorporated
Dale Weaver, Incorporated
Dan Brown Trucking
Dave Mattis Masonry
Dresser Industries-Minerals Division
Environmental Mgmt. Services Company
Exxon Company USA
Freeport Exploration Company
Frontier Petroleum Services
Getty Oil Company
Goton Outfitters
Grace Petroleum Company
Grass Creek Lumber Company
Grosch Construction Company
Gulf Oil Corporation
H & R Exploration
Hot Springs County REA
Hot Springs Title Company
Hrubetz Oil Company
HSB, Incorporated
Hughes Oil, Incorporated
Husky Oil Company
Intermountain Motor Sports
John W. Donnell Assoc., Incorporated
Kaycee Bentonite Corporation
Koch Production Company
Marathon Oil Company
Marathon Pipeline Company
McCormac Redi-Mix
McGarvin-Moberly Construction Company
Meridian Land & Mineral Company
Milestone Petroleum
Minerals Exploration Coalition
Mobil Oil Corporation
Montana-Dakota Utilities Company
Mountain Geophysical
Natural Gas Processing Company
Norpac Exploration Services, Incorporated
Northwestern Resources Company
Nupec Resources, Incorporated
Occidental Exploration & Production
Ozark Underground Laboratory
Pacific Power & Light Company
Peter Kiewit & Sons Mining
Petro-Lewis Corporation
Phillips Oil Company
Placid Oil
Prairie Winds Consulting Service
Ralph Wortham Construction
Santa Fe Energy Company
Shell Oil Company
Shellco Mines, Incorporated
Snyder Oil Company
Superior Oil Company
Tenneco
Texaco, Incorporated
Texas Gas Exploration Corporation
The Outdoorsman
Tri-County Telephone Assoc., Incorporated

Businesses (Continued)

Tri-State Generation & Transmission Assoc., Incorporated
True Oil Company
Union Carbide Corporation
Union Oil Company of California
Union Texas Petroleum
United Minerals Ltd.
Valley Construction Company
Washakie Abstract Company
Washakie Oil Company
Wyo-Ben, Incorporated
Wyoming Production Credit Assoc.
Wyoming Sawmills, Incorporated

Ranching/Grazing Interests

Arapahoe Padlock Ranch
Ewen Ranch, Incorporated
Flitner Land Company
Greer Brothers
Hamilton Ranch, Incorporated
Herbst Ranch
John Mercer, Incorporated
Mayland Brothers
Orchard Ranch Ltd.
Otter Creek Grazing Assoc.
Paintrock Angus Ranch
Paintrock Hereford Ranch
Shell Valley Ranch
Southfork Ranch, Incorporated
Tensleep Cattle Company
Valley Ranch
VE Bar Livestock Company

PUBLIC COMMENT

Comment letters were received during the public comment period from 169 individuals, agencies and organizations. Each letter was assigned a reference number which is used to identify the letters in the tables contained in this chapter. The major topics discussed in each letter were identified according to the topic categories listed in Table 45. Responses to the letters are printed in Table 46 and are keyed to the specific topics raised in the letters by a coding system which identifies the letter and a specific topic or paragraph in the letter (e.g., response 21-2 responds to letter 21, topic or paragraph 2). All letters have been reprinted verbatim. Handwritten letters (letters 6, 8, 96, 133, and 157) have been transcribed verbatim to provide better readability.

TABLE 45

GENERAL TOPICS ADDRESSED IN PUBLIC COMMENTS

Topic	Code
Wilderness	W
General Planning/Errors/Omissions	P
Cultural Resources/Paleontology	1
Wildlife/Threatened and Endangered Species	2
Range Management/Livestock Management/Wild Horse	3
Watershed/Soils/Area of Environmental Concern	4
Forestry/Vegetation	5
Minerals	6
Fire Management/Access	7
Recreation/Off-Road Vehicles	8
Lands and Realty Management	9
Riparian/Wetland Management	10
No Specific Comment/No Response Required	NR

Letters that discussed only wilderness have not been printed in Table 46. Likewise, we have not responded to comments pertaining to wilderness in letters printed in Table 46. All comments on wilderness will be addressed in detail in the Final Wilderness Environmental Impact Statement.

Some comments required a clarification of the information presented in the Draft RMP/EIS and that information is clarified in the responses to the comments. In some cases, text modifications were also made as a result of those comments. Other comments pointed out needed changes in the text, and those changes were made, as well. All changes to sections in the Draft RMP/EIS which have not been reprinted are listed in the Text Changes (Table 47). Some changes in text, maps, tables, and appendixes have also been reprinted in this document.

LIST OF RESPONDENTS

No. Assigned to Response	Name/Organization of Respondent	Topic(s) Addressed in Letter[1]
1	James M. Welch/Frontier Archeology	W,1
2	Reed Secord	W
3	Henry G. Wright	W
4	Walter & Dorothy Pelech	W
5	David K. Davenport	W
6	Archie L. Zacharias	W,2,3
7	Sohio Petroleum Company	W
8	John R. Swanson	W,2,5
9	William Cochran/USDI, Bureau of Mines	6
10	Regional Civil Eng./Dept. of the Air Force	P,7
11	Big Horn Co. Weed & Pest Control District	4
12	Bradley Penn, Marathon Oil Company	P,4,6,8
13	National Speleological Society, Inc.	NR
14	Melvin C. Rabb, Jr.	NR
15	Kirk Koepsel	W,3,6,8,9
16	Wendy H. Frueauf/Petroleum Association of Wyoming	W,P,2,6,9
17	Wayne Brewster/U.S. Fish and Wildlife Service	NR
18	Edward L. Schultz/U.S. Forest Service	10
19	Bradley Penn/Marathon Oil Co.	W,P,4
20	Tom Wolfe/The Natural Conservancy	W,2,3,4,5,6,10
21	Richard Gorton/Department of the Army	W,1,2,4,10
22	Orchard Ranch	W
23	Peter Field	NR
24	Richard A. Strait/National Park Service	NR
25	Jan Vleck	W
26	Melvin C. Raab, Jr.	W,P,2,3,4,9,10
27	Donald L. Purinton	W
28	Walter & Dorothy Palech	W
29	John R. Swanson	W
30	Robert & Ruth Zeller	W
31	Alice Frell Benitez/Rocky Mountain Oil & Gas Assoc.	W,P,6
32	Erwin & Peggy Bauer	W
33	J. Donovan Larson	W
34	Thomas A. Bliss	W
35	Jeff Thieret	W
36	Alice Hutchings/Alison Hutchings & Associates	W
37	Gregory Pais	W
38	Ola Harrison	W
39	Mike Breslow, M.D.	W
40	Jim Livermore	W
41	Karl Smith	W
42	John Stifler	W
43	John Evenson	W
44	Michael Memmer	W
45	Brian Paradise	W
46	Barbara Girdler	W
47	William Warren	W
48	Frannie Ford	W
49	Linelle Wagner	W
50	Allen L. Hammer	W
51	Richard Cook	W
52	Harry M. Dalton/Carauster Industries, Inc.	W
53	Robert Markeloff	W
54	Jack Welch	W
55	Kim Clarkin	W
56	Thomas Ribe	W
57	Kent Wagener	W
58	Genenvieve Vasquez	W

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[1] Refer to Table 45 for topic codes.

LIST OF RESPONDENTS (Continued)

No. Assigned to Response	Name/Organization of Respondent	Topic(s) Addressed in Letter[1]
59	Mark Brier	W
60	Tony Chambers	W
61	Penny Haase	W
62	Steve Giddings	W
63	Richard S. Idler, MD	W
64	Francis Petera/Wyoming Game & Fish Dept.	W,P,2,3,4,6,8,9,10
65	Samual Matos	W
66	Rich Camino	W
67	Ron Guenther/Sierra Club	W
68	Micheal DiGregorio	W
69	Ross Marquardt	W
70	Elizabeth Tormeon Hickey	W
71	Joseph Moore/Reed, Smith, Shaw, & McClay	W
72	Milton Allen	W
73	Susan Cox	W
74	Clark De Nevers	W
75	Darrell Leigh	W
76	Mark Gailey	W
77	William Sander, D.C.	W
78	Mary Gravitt	W
79	Daniel Barberis	W
80	Ron Good	W
81	Harold Mosher	W
82	Mike Massie	W
83	Rudy Lukez	W
84	James Fronk	W
85	Thomas Slone	W
86	Warren Murphy	W
87	Roger Hedland	W
88	Stephan Gates	W
89	The Wilderness Society/Northern Rockies Region	W
90	Lynn Schardt	W
91	Loring Woodman, Pres./Karwin Ranch	W
92	Dale Tutkowski	W
93	Sharyl Kinnear	W
94	Ylonda Stevens	W
95	Lee Levin	W
96	Rob Orchard	W,P,2,3,4,8,9,10
97	Caroline Byrd	W
98	Mark Parr	W
99	Jerry Schoen	W
100	Larry Meistrich	W
101	Randolph Helms	W
102	Sandy Eastoak	W
103	Thomas Messenger	W
104	John Wilson	W
105	Deborah Phelps	W
106	Arthur Andersen, US Fish & Wildlife Service	W,P,2,3,4,5,6,8,9
107	Ann B. Steven	W
108	A. M. Fisher	W
109	Timothy Rockhold	W
110	Sue Lowry/WY Sierra Club	W
111	Angus Brown	W
112	Deanna Glosser	W
113	Dr. John P. Rahart	W
114	Robert Saigh	W
115	Jim Allard	W
116	Mrs. Florence J. Spring	W

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[1] Refer to Table 45 for topic codes.

LIST OF RESPONDENTS (Continued)

No. Assigned to Response	Name/Organization of Respondent	Topic(s) Addressed in Letter[1]
117	Arthur W. Fayen	W
118	Betty Empey	W
119	David C. Jones	W,2,3
120	James K. Liden/Ft. Hays St. University	W
121	James M. Sprague, PhD/Univ. of Pennsylvania	W
122	Dennis Jones	P,3
123	Richard H. Hiers	W
124	Robert B. Keiter	W
125	R. Schmeidt, M.D.	W
126	William Lynn and Ann Minnick	W
127	Dick Loper/Wyoming State Grazing Board	P,2,3,4,10
128	Sterling Evans/Wyoming Sierra Club	W
129	Margaret E. Murie	W
130	Christopher S. Stoner	W
131	Sneed B. Collard III	W
132	Charles S. Orchard	W,P,2,3,4,8,9,10
133	Merle Hamilton	W,4
134	Bob Giurgevich	W
135	Pete Perrine	W
136	Lowell Krassner	W
137	Dr. & Mrs. William Wallace	W
138	Mrs. Sprinkle	W
139	Janet Patton	W
140	Bob Patton	W
141	Dexter Perkins	W
142	D. L. Langdon	W
143	Kent Knisley	W
144	Meredith Taylor	W
145	Larry Mehlhaff/Sierra Club	W,P,2,3,5,6,8
146	U.S. Environmental Protection Agency	W,P,2,3,4,5,7
147	Wyoming Wildlife Federation	W,P,2, NR
148	Matt Sprinkle	W
149	Lesli Hamilton	W
150	John Lamb	W
151	Harold Ekart	W
152	Virgil Q. Russell	3,4, NR
153	Mark Lawler	W
154	Neil & Jennifer Miller	W
155	Lynn Kinter/Friends of Wild Wyoming Desert	W,P,6,8
156	William Budge	W
157	Larry DiBrito	W,P,3, NR
158	Honorable Mike Sullivan/Governor of Wyoming	NR
159	Wyoming Recreation Commission	W,8
160	Wyoming Department of Environmental Quality	P,3,4,6,8,10
161	The Geological Survey of Wyoming	W,P,4,6
162	Wyoming State Engineer's Office	4
163	Wyoming State Historic Preservation Office	1, NR
164	Wyoming Water Development Commission	4
165	Office of the Governor, Rod Miller	3,10
166	Larry DeBrito	W
167	Stephan Warble	W
168	Bruce Baker/Wyoming Chap. of the Wildlife Society	W,P,2,3,5,6,7,8,9,10
169	Anthony Borrie	W
170	Kirk Koepsel (telephone conversation)	P, NR
171	Peggy Kara (telephone conversation)	NR
172	Transcript from public hearing 12/11/86	P,2,3,4,5,6,9,10
173	Wayne Brewster/U.S. Fish and Wildlife Service	W

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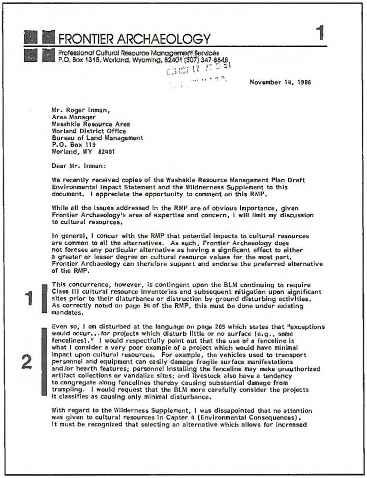
[1] Refer to Table 45 for topic codes.



FRONTIER ARCHAEOLOGY
Professional Cultural Resource Management Services
P.O. Box 1315, Worland, Wyoming, 82401 (307) 347-8848

1

NOV 17

November 14, 1986

Mr. Roger Inman,
Area Manager
Wasahkie Resource Area
Worland District Office
Bureau of Land Management
P.O. Box 119
Worland, WY 82401

Dear Mr. Inman:

We recently received copies of the Washakie Resource Management Plan Draft Environmental Impact Statement and the Wildnerness Supplement to this document. I appreciate the opportunity to comment on this RMP.

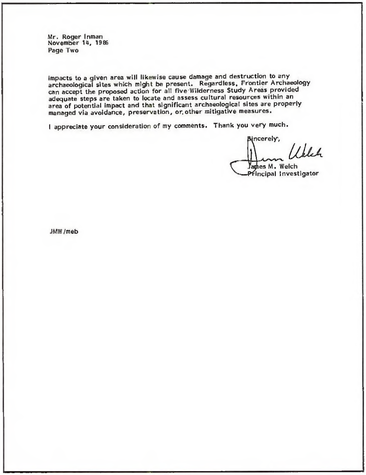
While all the issues addressed in the RMP are of obvious importance, given Frontier Archaeology's area of expertise and concern, I will limit my discussion to cultural resources.

In general, I concur with the RMP that potential impacts to cultural resources are common to all the alternatives. As such, Frontier Archaeology does not foresee any particular alternative as having a signficant effect to either a greater or lesser degree on cultural resource values for the most part. Frontier Archaeology can therefore support and endorse the preferred alternative of the RMP.

1 This concurrence, however, is contingent upon the BLM continuing to require Class III cultural resource inventories and subsequent mitigation upon significant sites prior to their diaturbance or distruction by ground disturbing activities. As correctly noted on page 94 of the RMP, this must be done under existing mandates.

2 Even so, I am disturbed at the language on page 205 which states that "exceptions would occur...for projects which disturb little or no surface (e.g., some fencelines)." I would respectfully point out that the use of a fenceline is what I consider a very poor example of a project which would have minimal impact upon cultural resources. For example, the vehicles used to transport personnel and equipment can easily damage fragile surface manifestations and/or hearth features; personnel installing the fenceline may make unauthorized artifact collections or vandalize sites; and livestock also have a tendency to congregate along fencelines thereby causing substantial damage from trampling. I would request that the BLM more carefully consider the projects it classifies as causing only minimal disturbance.

With regard to the Wilderness Supplement, I was dissapointed that no attention was given to cultural resources in Capter 4 (Environmental Consequences). It must be recognized that selecting an alternative which allows for increased



Mr. Roger Inman
November 14, 1986
Page Two

impacts to a given area will likewise cause damage and destruction to any archaeological sites which might be present. Regardless, Frontier Archaeology can accept the proposed action for all five Wilderness Study Areas provided adequate steps are taken to locate and assess cultural resources within an area of potential impact and that significant archaeological sites are properly managed via avoidance, preservation, or other mitigative measures.

I appreciate your consideration of my comments. Thank you very much.

Sincerely,

Jim Welch

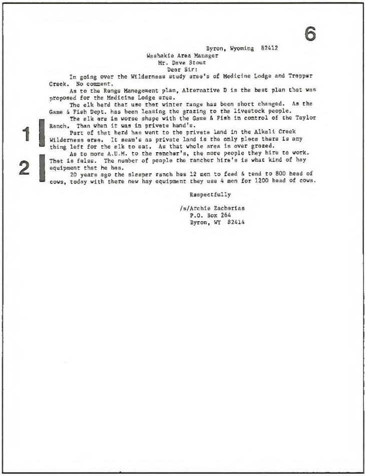
James M. Welch
Principal Investigator

JMW/meb

Response to Letter 1

1-1 The BLM will continue to require Class III cultural resource inventories and mitigation of impacts prior to approval of surface disturbing projects. There is no reason to expect changes in existing mandates.

1-2 The use of fencelines was a poor choice for an example of projects that disturb little or no surface. The text on page 205 has been revised to include examples such as spray projects, wilderness designation and dispersed recreation.



6

Byron, Wyoming 82412

Washakie Area Manager
Mr. Dave Stout
Dear Sir:

In going over the Wilderness study area's of Medicine Lodge and Trapper Creek. No comment.

As to the Range Management plan, Alternative D is the best plan that was proposed for the Medicine Lodge area.

The elk herd that use that winter range has been short changed. As the Game & Fish Dept. has been leasing the grazing to the livestock people.

The elk are in worse shape with the Game & Fish in control of the Taylor Ranch. Than when it was in private hand's.

1 Part of that herd has went to the private land in the Alkali Creek Wilderness area. It seem's as private land is the only place there is any thing left for the elk to eat. As that whole area is over grazed.

2 As to more A.U.M. to the rancher's, the more people they hire to work. That is false. The number of people the rancher hire's is what kind of hay equipment that he has.

20 years ago the sleeper ranch has 12 men to feed & tend to 800 head of cows, today with there new hay equipment they use 4 men for 1200 head of cows.

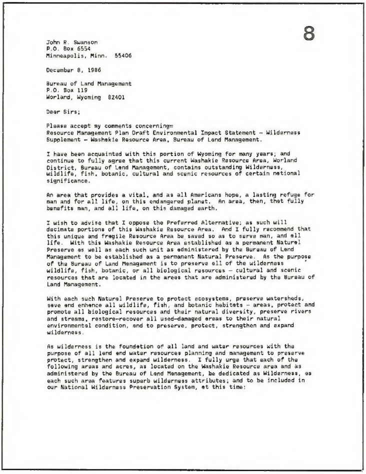
Respectfully

/s/Archie Zacharias
P.O. Box 264
Byron, WY 82414

Response to Letter 6

6-1 Data indicate that forage for elk, deer and livestock is in short supply in the Medicine Lodge area. In an effort to alleviate that situation, we are working with the Wyoming Game and Fish Department in their efforts to increase forage for wildlife. Options being considered are habitat improvement projects, reducing or eliminating livestock grazing, and other practices or projects that will resolve the current problems. Similar efforts are being undertaken in other habitat units.

6-2 Additional revenue created by increased livestock production may create jobs outside of ranching operations. For example, additional employment may be created at the local feed and veterinary supply stores or machinery dealership.



8

John R. Swanson
P.O. Box 6554
Minneapolis, Minn. 55406

December 8, 1986

Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Sirs;

Please accept my comments concerning=
Resource Management Plan Draft Environmental Impact Statement – Wilderness Supplement – Washakie Resource Area, Bureau of Land Management.

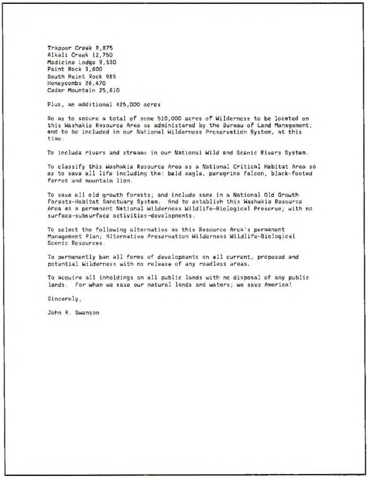
I have been acquainted with this portion of Wyoming for many years; and continue to fully agree that this current Washakie Resource Area, Worland District, Bureau of Land Management, contains outstanding Wilderness, wildlife, fish, botanic, cultural and scenic resources of certain national significance.

An area that provides a vital, and as all Americans hope, a lasting refuge for man and for all life, on this endangered planet. An area, then, that fully benefits man, and all life, on this damaged earth.

I wish to advise that I oppose the Preferred Alternative; as such will decimate portions of this Washakie Resource Area. And I fully recommend that this unique and fragile Resource Area be saved so as to serve man, and all life. With this Washakie Resource Area established as a permanent Natural Preserve as well as each such unit as administered by the Bureau of Land Management to be established as a permanent Natural Preserve. As the purpose of the Bureau of Land Management is to preserve all of the wilderness wildlife, fish, botanic, or all biological resources – cultural and scenic resources that are located in the areas that are administered by the Bureau of Land Management.

With each such Natural Preserve to protect ecosystems, preserve watersheds, save and enhance all wildlife, fish, and botanic habitats – areas, protect and promote all biological resources and their natural diversity, preserve rivers and streams, restore-recover all used-damaged areas to their natural environmental condition, and to preserve, protect, strengthen and expand wilderness.

As wilderness is the foundation of all land and water resources with the purpose of all land and water resources planning and management to preserve protect, strengthen and expand wilderness. I fully urge that each of the following areas and acres, as located on the Washakie Resource area and as administered by the Bureau of Land Management, be dedicated as Wilderness, as each such area features superb wilderness attributes; and to be included in our National Wilderness Preservation System, at this time:



Trapper Creek 8,875
Alkali Creek 12,750
Medicine Lodge 9,530
Paint Rock 3,600
South Paint Rock 985
Honeycombs 26,470
Cedar Mountain 25,610

Plus, an additional 425,000 acres

So as to secure a total of some 510,000 acres of Wilderness to be located on this Washakie Resource Area as administered by the Bureau of Land Management; and to be included in our National Wilderness Preservation System, at this time.

To include rivers and streams in our National Wild and Scenic Rivers System.

To classify this Washakie Resource Area as a National Critical Habitat Area so as to save all life including the: bald eagle, peregrine falcon, black-footed ferret and mountain lion.

To save all old growth forests; and include same in a National Old Growth Forests-Habitat Sanctuary System. And to establish this Washakie Resource Area as a permanent National Wilderness Wildlife-Biological Preserve; with no surface-subsurface activities-developments.

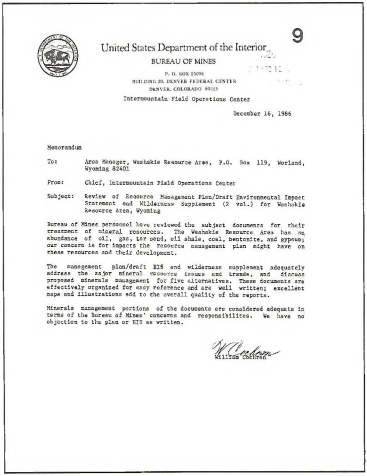
To select the following alternative as this Resource Area's permanent Management Plan; Alternative Preservation Wilderness Wildlife-Biological Scenic Resources.

To permanently ban all forms of developments on all current, proposed and potential Wilderness with no release of any roadless areas.

To acquire all inholdings on all public lands with no disposal of any public lands. For when we save our natural lands and waters; we save America!

Sincerely,

John R. Swanson



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United States Department of the Interior
BUREAU OF MINES
P. O. BOX 25086
BUILDING 20, DENVER FEDERAL CENTER
DENVER, COLORADO 80225
Intermountain Field Operations Center

December 16, 1986

Memorandum

To: Area Manager, Washakie Resource Area, P.O. Box 119, Worland, Wyoming 82401

From: Chief, Intermountain Field Operations Center

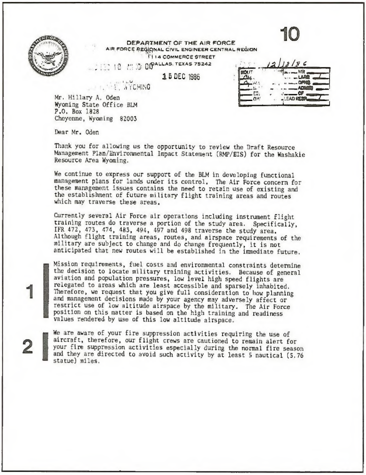
Subject: Review of Resource Management Plan/Draft Environmental Impact Statement and Wilderness Supplement (2 vol.) for Washakie Resource Area, Wyoming

Bureau of Mines personnel have reviewed the subject documents for their treatment of mineral resources. The Washakie Resource Area has an abundance of oil, gas, tar sand, oil shale, coal, bentonite, and gypsum; our concern is for impacts the resource management plan might have on these resources and their development.

The management plan/draft EIS and wilderness supplement adequately address the major mineral resource issues and trends, and discuss proposed minerals management for five alternatives. These documents are effectively organized for easy reference and are well written; excellent maps and illustrations add to the overall quality of the reports.

Minerals management portions of the documents are considered adequate in terms of the Bureau of Mines' concerns and responsibilites. We have no objection to the plan or EIS as written.

W Cochran
William Cochran



10

DEPARTMENT OF THE AIR FORCE
AIR FORCE REGIONAL CIVIL ENGINEER CENTRAL REGION
1114 COMMERCE STREET
DALLAS, TEXAS 75242

12/18/86

15 DEC 1986

Mr. Hillary A. Oden
Wyoming State Office BLM
P.O. Box 1828
Cheyenne, Wyoming 82003

Dear Mr. Oden

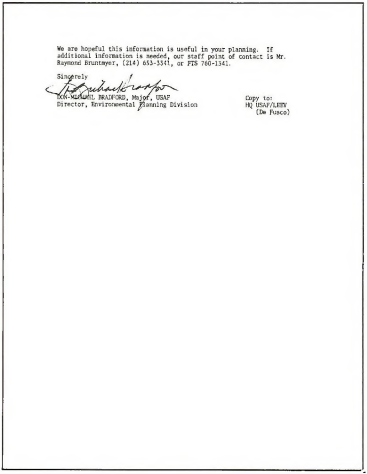
Thank you for allowing us the opportunity to review the Draft Resource Management Plan/Environmental Impact Statement (RMP/EIS) for the Washakie Resource Area Wyoming.

We continue to express our support of the BLM in developing functional management plans for lands under its control. The Air Force concern for these management issues contains the need to retain use of existing and the establishment of future military flight training areas and routes which may traverse these areas.

Currently several Air Force air operations including instrument flight training routes do traverse a portion of the study area. Specifically, IFR 472, 473, 474, 483, 494, 497 and 498 traverse the study area. Although flight training areas, routes, and airspace requirements of the military are subject to change and do change frequently, it is not anticipated that new routes will be established in the immediate future.

1 Mission requirements, fuel costs and environmental constraints determine the decision to locate military training activities. Because of general aviation and population pressures, low level high speed flights are relegated to areas which are least accessible and sparsely inhabited. Therefore, we request that you give full consideration to how planning and management decisions made by your agency may adversely affect or restrict use of low altitude airspace by the military. The Air Force position on this matter is based on the high training and readiness values rendered by use of this low altitude airspace.

2 We are aware of your fire suppression activities requiring the use of aircraft, therefore, our flight crews are cautioned to remain alert for your fire suppression activities especially during the normal fire season and they are directed to avoid such activity by at least 5 nautical (5.76 statue) miles.



We are hopeful this information is useful in your planning. If additional information is needed, our staff point of contact is Mr. Raymond Bruntmyer, (214) 653-3341, or FTS 760-1341.

Sincerely

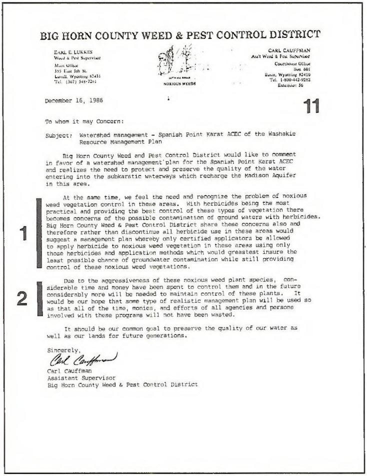
DON-MICHAEL BRADFORD, Major, USAF
Director, Environmental Planning Division

Copy to:
HQ USAF/LEEV
(De Fusco)

Response to Letter 10

10-1 Our present aviation and fire suppression programs take into consideration all existing low level military flight training routes. We do not anticipate any changes resulting from the Washakie RMP that would affect military training flights.

10-2 The impact of smoke from prescribed fires on Air Force training missions will be considered in all environmental reviews of prescribed burn plans and included in fire management activity plans.



BIG HORN COUNTY WEED & PEST CONTROL DISTRICT

EARL E. LUKKES
Weed & Pest Supervisor
Main Office
355 East 5th St.
Lovell, Wyoming 82431
Tel. (307) 548-7261

NOXIOUS WEEDS

CARL CAUFFMAN
Ass't Weed & Pest Supervisor
Courthouse Office
Box 601
Basin, Wyoming 82410
Tel. 1-800-442-9262
Extension 56

December 16, 1986

11

To whom it may Concern:

Subject: Watershed management - Spanish Point Karst ACEC of the Washakie Resource Management Plan

Big Horn County Weed and Pest Control District would like to comment in favor of a watershed management plan for the Spanish Point Karst ACEC and realizes the need to protect and preserve the quality of the water entering into the subkarstic waterways which recharge the Madison Aquifer in this area.

1 At the same time, we feel the need and recognize the problem of noxious weed vegetation control in these areas. With herbicides being the most practical and providing the best control of these types of vegetation there becomes concerns of the possible contamination of ground waters with herbicides. Big Horn County Weed & Pest Control District share these concerns also and therefore rather than discontinue all herbicide use in these areas would suggest a management plan whereby only certified applicators be allowed to apply herbicide to noxious weed vegetation in these areas using only those herbicides and application methods which would greatest insure the least possible chance of groundwater contamination while still providing control of these noxious weed vegetations.

2 Due to the aggressiveness of these noxious weed plant species, considerable time and money have been spent to control them and in the future considerably more will be needed to maintain control of these plants. It would be our hope that some type of realistic management plan will be used so as that all of the time, monies, and efforts of all agencies and persons involved with these programs will not have been wasted.

It should be our common goal to preserve the quality of our water as well as our lands for future generations.

Sincerely,

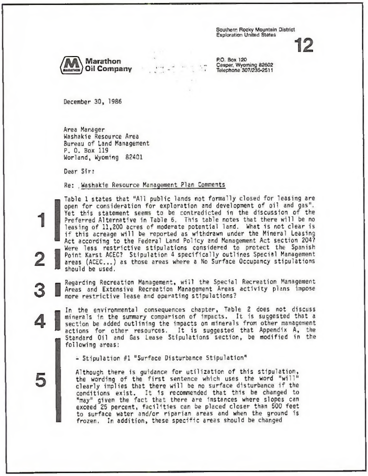
Carl Cauffman

Carl Cauffman
Assistant Supervisor
Big Horn County Weed & Pest Control District

Response to Letter 11

11-1 The BLM shares your concerns for groundwater contamination and controlling noxious weeds. We have reconsidered the strict "no pesticide" application mitigation described in Chapter 2 (the Preferred Alternative and Alternatives C and D) of the Draft RMP/EIS. Appropriate changes have been made in the Final RMP/EIS.

11-2 A site specific Area of Critical Environmental Concern (ACEC) management plan may be developed for the designated Spanish Point Karst ACEC if the management prescriptions within the RMP are not specific enough to address relevant resource concerns. The revised guidelines for control of noxious weeds proposed in the Final RMP/EIS would be included in an ACEC management plan. While these guidelines are still more restrictive than BLM's usual pesticide use approval process, we feel they represent a reasonable compromise for the use of pesticides, considering the resources at risk within the proposed ACEC, and do not produce an unnecessary burden on persons and agencies involved in weed control.



Southern Rocky Mountain District
Exploration United States

Marathon Oil Company

P.O. Box 120
Casper, Wyoming 82602
Telephone 307/235-2511

12

December 30, 1986

Area Manager
Washakie Resource Area
Bureau of Land Management
P. O. Box 119
Worland, Wyoming 82401

Dear Sir:

Re: Washakie Resource Management Plan Comments

1 Table 1 states that "All public lands not formally closed for leasing are open for consideration for exploration and development of oil and gas". Yet this statement seems to be contradicted in the discussion of the Preferred Alternative in Table 6. This table notes that there will be no leasing of 11,200 acres of moderate potential land. What is not clear is if this acreage will be reported as withdrawn under the Mineral Leasing Act according to the Federal Land Policy and Management Act section 204?
2 Were less restrictive stipulations considered to protect the Spanish Point Karst ACEC? Stipulation 4 specifically outlines Special Management areas (ACEC...) as those areas where a No Surface Occupancy stipulations should be used.

3 Regarding Recreation Management, will the Special Recreation Management Areas and Extensive Recreation Management Areas activity plans impose more restrictive lease and operating stipulations?

4 In the environmental consequences chapter, Table 2 does not discuss minerals in the summary comparison of impacts. It is suggested that a section be added outlining the impacts on minerals from other management actions for other resources. It is suggested that Appendix A, the Standard Oil and Gas Lease Stipulations section, be modified in the following areas:

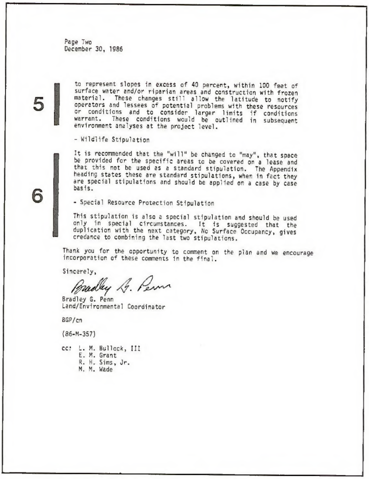
- Stipulation #1 "Surface Disturbance Stipulation"

5 Although there is guidance for utilization of this stipulation, the wording of the first sentence which uses the word "will" clearly implies that there will be no surface disturbance if the conditions exist. It is recommended that this be changed to "may" given the fact that there are instances where slopes can exceed 25 percent, facilities can be placed closer than 500 feet to surface water and/or riparian areas and when the ground is frozen. In addition, these specific areas should be changed

Response to Letter 12

12-1 With reference to Tables 1 and 6 in the Draft RMP/EIS, it is our intention under the Preferred Alternative to no longer lease 11,200 acres for oil and gas. The remaining acreage in the planning area, that area not closed to leasing, would remain open for consideration for oil and gas leasing, exploration and development. In the description of the Preferred Alternative in the Draft RMP/EIS it is specifically stated that a formal withdrawal from mining claim location would be pursued for the 11,200 acres of federal mineral estate in the Spanish Point Karst ACEC. However, we are clarifying that point by referencing Section 204 of the FLPMA.

12-2 The "no surface occupancy" stipulation in the revised Appendix A does not preclude the use of the "no lease" management option if less stringent stipulations (e.g., "no surface occupancy") are determined to be insufficient. Less stringent restrictions in the proposed Spanish Point Karst ACEC were considered. Considerations included: Alternative A, no special stipulations; Alternative B, the use of special sub-surface stipulations requiring that exploratory drilling and/or



Page Two
December 30, 1986

5 to represent slopes in excess of 40 percent, within 100 feet of surface water and/or riparian areas and construction with frozen material. These changes still allow the latitude to notify operators and lessees of potential problems with these resources or conditions and to consider larger limits if conditions warrant. These conditions would be outlined in subsequent environment analyses at the project level.

- Wildlife Stipulation

6 It is recommended that the "will" be changed to "may", that space be provided for the specific areas to be covered on a lease and that this not be used as a standard stipulation. The Appendix heading states these are standard stipulations, when in fact they are special stipulations and should be applied on a case by case basis.

- Special Resource Protection Stipulation

This stipulation is also a special stipulation and should be used only in special circumstances. It is suggested that the duplication with the next category, No Surface Occupancy, gives credance to combining the last two stipulations.

Thank you for the opportunity to comment on the plan and we encourage incorporation of these comments in the final.

Sincerely,

Bradley G. Penn

Bradley G. Penn
Land/Environmental Coordinator

BGP/cn

(86-M-357)

cc: L. M. Bullock, III
E. M. Grant
R. H. Sims, Jr.
M. M. Wade

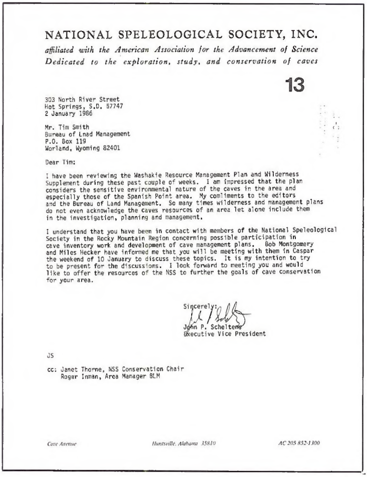
mineral development be conducted in a way that would avoid caves, caverns, and karstic waterways; and Alternative C, the use of the combination of sub-surface stipulations and the "no surface occupancy" stipulations. The overriding factor in proposing the option of closing the area to leasing was the present limited extent of knowledge regarding the exact location of caves, caverns and passageways within the proposed ACEC. Although many passages have been explored, extensive mapping of the area has not occurred. Therefore, the BLM could not provide a lessee with stipulations containing precise information relating to the location of underground caverns so that avoidance of these areas could be successfully accomplished, even through employment of directional drilling technologies. In addition, there is high probability that undiscovered passageways and caverns exist within the boundaries of the proposed ACEC.

12-3 The purpose of these activity plans is to enhance recreation opportunities and to reduce conflicts caused either by recreation activities or by other activities on recreation opportunities. Oil and gas leases would be restricted by stipulations applied at the time of lease issuance. Any other stipulations that may affect oil and gas developmental and operational activities would result from the environmental assessment process, such as during the review of an APD. Unless conflicts between high quality recreation values and oil and gas development are identified, we do not envision the imposition of more restrictive stipulations.

12-4 The discussion of mineral related impacts is found in Table 2 of the Draft RMP/EIS under the headings of "Land Uses" and "Socioeconomics." Impacts on mineral development and on other resources affected by mineral development are discussed in detail in Chapter 4.

12-5 The standard stipulations in Appendix A were developed in the BLM's Wyoming State Office, based on statewide input and the best available information, to fit the majority of situations we encounter. Since oil and gas leases are issued before there is ever a proposal for exploratory drilling or subsequent development, use of the standard stipulations and the word "will" in the stipulations properly express our intent. It is than incumbent upon the leaseholder to show (e.g. in the drilling proposal) where modification of the standard stipulations may be appropriate to a specific site. Also, please note that the standard stipulations and their wording are a matter of policy. The RMP is not making decisions on what the standard stipulations will be. Rather, the standard stipulations are used in the RMP as a tool to help develop the plan alternatives and to provide a baseline for comparative impact analysis in arriving at the plan's decisions. Following the RMP, they are used in the same manner in analyzing exploration and development proposals.

12-6 We agree that stipulations 2, 3 and 4 are "special" in that they are applied only on a case-by-case basis, in contrast to stipulation 1 which is applied to all leases. However, the wording and application guidance of these stipulations is standard and that is why they are called "standard" stipulations. Being a matter of policy, the wording of these stipulations are subject to change through administrative review, not through the RMP process. Also, see response 12-5.



NATIONAL SPELEOLOGICAL SOCIETY, INC.
affiliated with the American Association for the Advancement of Science
Dedicated to the exploration, study, and conservation of caves

13

303 North River Street
Hot Springs, S.D. 57747
2 January 1986

Mr. Tim Smith
Bureau of Lnad Management
P.O. Box 119
Worland, Wyoming 82401

Dear Tim:

I have been reviewing the Washakie Resource Management Plan and Wilderness Supplement during these past couple of weeks. I am impressed that the plan considers the sensitive environmental nature of the caves in the area and especially those of the Spanish Point area. My comliments to the editors and the Bureau of Land Management. So many times wilderness and management plans do not even acknowledge the caves resources of an area let alone include them in the investigation, planning and management.

I understand that you have been in contact with members of the National Speleological Society in the Rocky Mountain Region concerning possible participation in cave inventory work and development of cave management plans. Bob Montgomery and Miles Hecker have informed me that you will be meeting with them in Caspar the weekend of 10 January to discuss these topics. It is my intention to try to be present for the discussions. I look forward to meeting you and would like to offer the resources of the NSS to further the goals of cave conservation for your area.

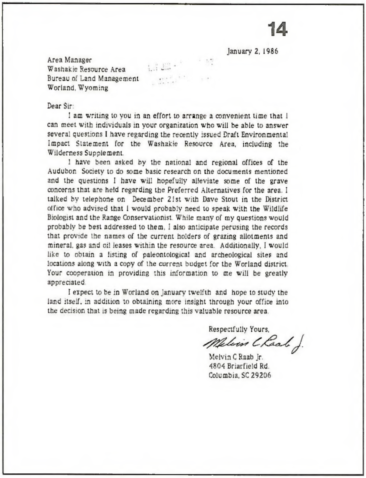
Sincerely:

John P. Scheltens
Executive Vice President

JS

cc: Janet Thorne, NSS Conservation Chair
    Roger Inman, Area Manager BLM

Cave Avenue *Huntsville, Alabama 35810* *AC 205 852-1300*



14

January 2, 1986

Area Manager
Washakie Resource Area
Bureau of Land Management
Worland, Wyoming

Dear Sir:

I am writing to you in an effort to arrange a convenient time that I can meet with individuals in your organization who will be able to answer several questions I have regarding the recently issued Draft Environmental Impact Statement for the Washakie Resource Area, including the Wilderness Supplement.

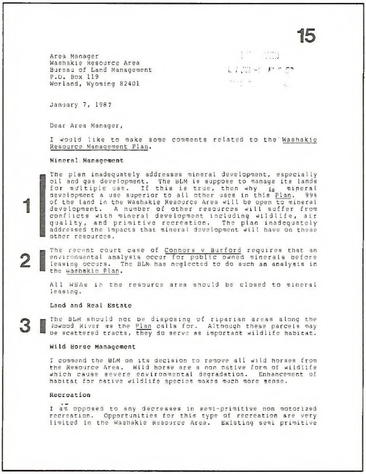
I have been asked by the national and regional offices of the Audubon Society to do some basic research on the documents mentioned and the questions I have will hopefully alleviate some of the grave concerns that are held regarding the Preferred Alternatives for the area. I talked by telephone on December 21st with Dave Stout in the District office who advised that I would probably need to speak with the Wildlife Biologist and the Range Conservationist. While many of my questions would probably be best addressed to them, I also anticipate perusing the records that provide the names of the current holders of grazing allotments and mineral, gas and oil leases within the resource area. Additionally, I would like to obtain a listing of paleontological and archeological sites and locations along with a copy of the current budget for the Worland district. Your cooperation in providing this information to me will be greatly appreciated.

I expect to be in Worland on January twelfth and hope to study the land itself, in addition to obtaining more insight through your office into the decision that is being made regarding this valuable resource area.

Respectfully Yours,

Melvin C Raab Jr.

Melvin C Raab Jr.
4804 Briarfield Rd.
Columbia, SC 29206



15

Area Manager
Washakie Resource Area
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

January 7, 1987

Dear Area Manager,

I would like to make some comments related to the Washakie Resource Management Plan.

Mineral Management

1 The plan inadequately addresses mineral development, especially oil and gas development. The BLM is suppose to manage its lands for multiple use. If this is true, then why is mineral development a use superior to all other uses in this Plan. 99% of the land in the Washakie Resource Area will be open to mineral development. A number of other resources will suffer from conflicts with mineral development including wildlife, air quality, and primitive recreation. The plan inadequately addressed the impacts that mineral development will have on these other resources.

2 The recent court case of Connors v Burford requires that an environmental analysis occur for public owned minerals before leasing occurs. The BLM has neglected to do such an analysis in the Washakie Plan.

All WSAs in the resource area should be closed to mineral leasing.

Land and Real Estate

3 The BLM should not be disposing of riparian areas along the Nowood River as the Plan calls for. Although these parcels may be scattered tracts, they do serve as important wildlife habitat.

Wild Horse Management

I commend the BLM on its decision to remove all wild horses from the Resource Area. Wild horse are a non native form of wildlife which cause severe environmental degradation. Enhancement of habitat for native wildlife species makes much more sense.

Recreation

I am opposed to any decreases in semi-primitive non motorized recreation. Opportunities for this type of recreation are very limited in the Washakie Resource Area. Existing semi primitive

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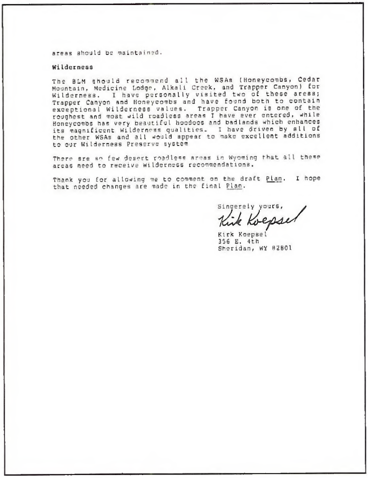
Response to Letter 15

15-1 Mineral use is not a superior use, but is one of many uses. The passage of the 1920 Mineral Leasing Act directed that public lands will be leased for mineral development. The analysis in the Draft RMP/EIS shows that with proper control, oil and gas leasing and subsequent development can be compatible with most other uses. While 99 percent of the resource area is open for consideration for leasing under the Preferred Alternative, 66 percent of that area is subject to special stipulations of varying degrees of restriction, to protect other resources. None of the resource area is open to completely unrestricted leasing or development. Additionally, all development activities are subject to site specific environmental review and mitigation of impacts.

15-2 The leasing of federal minerals was analyzed in 1980 in the environmental assessment "Washakie Resource Area Oil & Gas Environmental Assessment." The Washakie RMP/EIS is an environmental impact statement and it also satisfies the requirement for environmental analysis prior to leasing of publicly owned minerals.



areas should be maintained.

Wilderness

The BLM should recommend all the WSAs (Honeycombs, Cedar Mountain, Medicine Lodge, Alkali Creek, and Trapper Canyon) for Wilderness. I have personally visited two of these areas; Trapper Canyon and Honeycombs and have found both to contain exceptional Wilderness values. Trapper Canyon is one of the roughest and most wild roadless areas I have ever entered, while Honeycombs has very beautiful hoodoos and badlands which enhances its magnificent Wilderness qualities. I have driven by all of the other WSAs and all would appear to make excellent additions to our Wilderness Preserve system

There are so few desert roadless areas in Wyoming that all these areas need to receive Wilderness recommendations.

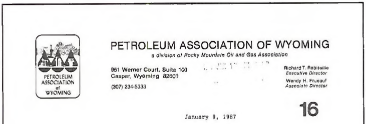
Thank you for allowing me to comment on the draft Plan. I hope that needed changes are made in the final Plan.

Sincerely yours,

Kirk Koepsel

Kirk Koepsel
356 E. 4th
Sheridan, WY 82801

15-3 Appendix B in the Draft RMP/EIS lists the criteria which make lands unsuitable for sale or exchange. The criteria include wetlands and crucial and critical wildlife habitats.Any parcel involved in a disposal proposal would be fully evaluated according to the criteria listed in Appendix B. Only site specific examinations would be used to assess the suitability for disposal of the scattered tracts identified in the RMP/EIS as having future potential for disposal or transfer.



PETROLEUM ASSOCIATION OF WYOMING
a division of Rocky Mountain Oil and Gas Association

951 Werner Court, Suite 100
Casper, Wyoming 82601
(307) 234-5333

Richard T. Robitaille
Executive Director
Wendy H. Frueauf
Associate Director

16

January 9, 1987

Mr. David Stout
Washakie Resource Area
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Stout:

On behalf of the Petroleum Association of Wyoming (PAW), a division of the Rocky Mountain Oil and Gas Association, whose members account for more than 90% of the oil and gas exploration and production in Wyoming, please accept the following comments on the Draft Washakie Resource Management Plan and Wilderness Supplement.

PAW is in general support of the preferred alternative, (pages 21-34). We are concerned, however, over the large percentage of acreage in the resource area restricted from oil and gas activities.

1 The Federal Land Planning and Management Act requires all land withdrawals over 5,000 acres in size to be formally withdrawn. The 11,200 acre Spanish Point Karst ACEC is designated a "no lease" area in the draft plan and should be formally withdrawn if it is to be closed to mineral leasing.

2 Similarly, we are concerned over the permanent no surface occupancy stipulation encompassing the West Slope Canyons for a total of 83,500 acres, essentially precluding any mineral development. We recommend a review of this large area to determine if it does meet the "rigorous test" necessary for stipulation number four (page 161) and if the need is fully documented in the record.

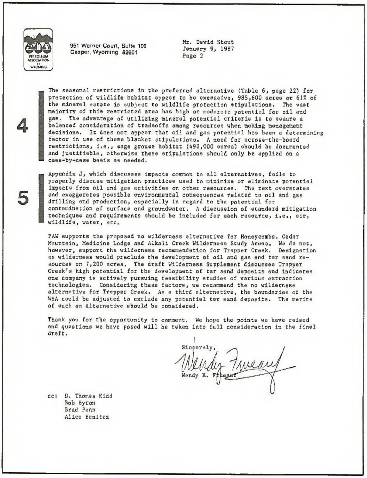
3 We note the draft plan has utilized hydrocarbon potential criteria in the development of alternatives. We appreciate this method of analysis. We do not, however, find reference to high, moderate and low potential acreage totals of the federal mineral estate. Is it accurate to calculate these totals by adding together the acres in each lease restriction category in Table 6, page 22? Total acreage in each hydrocarbon potential category should be included in the table or text.

Response to Letter 16

16-1 The withdrawal provision in Section 203 of the Federal Land Policy and Management Act does not pertain to leasable minerals. While we would pursue a withdrawal from the nondiscretionary land laws (including locatable minerals) for the proposed ACEC, it is not appropriate to withdraw from leasable minerals. Thus, we are proposing a closure to leasing, not a withdrawal. (Refer also to responses 12-1 and 31-1).

16-2 The "rigorous test" requirement discussed in the stipulation #4 as it relates to oil and gas leasing, refers to the application of "no lease" over "no surface occupancy," not to the use of "no surface occupancy." In any case, we believe the NSO stipulation on the West Slope canyons is appropriate for oil and gas activities. The narrowness of the restricted areas would allow directional drilling from a reasonable distance. Oil and gas development of leases probably would not be precluded in the vast majority of cases.

16-3 The estimated acres of federal mineral estate in each of the hydrocarbon potential zones are additive (as in Tables 6, 9, 13 and 15 of the Draft RMP/EIS). Totals and



PETROLEUM ASSOCIATION of WYOMING
951 Werner Court, Suite 100
Casper, Wyoming 82601

Mr. David Stout
January 9, 1987
Page 2

4 The seasonal restrictions in the preferred alternative (Table 6, page 22) for protection of wildlife habitat appear to be excessive, 985,600 acres or 61% of the mineral estate is subject to wildlife protection stipulations. The vast majority of this restricted area has high or moderate potential for oil and gas. The advantage of utilizing mineral potential criteria is to assure a balanced consideration of tradeoffs among resources when making management decisions. It does not appear that oil and gas potential has been a determining factor in use of these blanket stipulations. A need for across-the-board restrictions, i.e., sage grouse habitat (492,000 acres) should be documented and justifiable, otherwise these stipulations should only be applied on a case-by-case basis as needed.

5 Appendix J, which discusses impacts common to all alternatives, fails to properly discuss mitigation practices used to minimize or eliminate potential impacts from oil and gas activities on other resources. The text overstates and exaggerates possible environmental consequences related to oil and gas drilling and production, especially in regard to the potential for contamination of surface and groundwater. A discussion of standard mitigation techniques and requirements should be included for each resource, i.e., air, wildlife, water, etc.

PAW supports the proposed no wilderness alternative for Honeycombs, Cedar Mountain, Medicine Lodge and Alkali Creek Wilderness Study Areas. We do not, however, support the wilderness recommendation for Trapper Creek. Designation as wilderness would preclude the development of oil and gas and tar sand resources on 7,200 acres. The draft Wilderness Supplement discusses Trapper Creek's high potential for the development of tar sand deposits and indicates one company is actively pursuing feasibility studies of various extraction technologies. Considering these factors, we recommend the no wilderness alternative for Trapper Creek. As a third alternative, the boundaries of the WSA could be adjusted to exclude any potential tar sand deposits. The merits of such an alternative should be considered.

Thank you for the opportunity to comment. We hope the points we have raised and questions we have posed will be taken into full consideration in the final draft.

Sincerely,

Wendy Frueauf

Wendy H. Frueauf

cc: D. Thomas Kidd
Bob Byron
Brad Penn
Alice Benitez

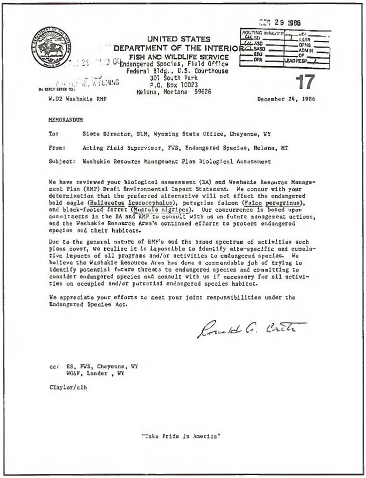
subtotals would help clarify these tables and we have adjusted them accordingly.

16-4 While it appears on the surface that a large amount of the resource area is subject to seasonal restrictions, the very nature of those restrictions, upon further analysis, allows for substantial latitude in application. The seasonal wildlife stipulations affecting 985,600 acres allow for the exploration and development of oil and gas by the very fact that they are seasonal (limited in duration). Further, seasonal wildlife stipulations may be modified in any year by the authorized officer to accommodate such variables as climate and the presence or absence of species being protected.

While restrictions on 492,000 acres of sage grouse habitat may seem excessive, that acreage represents only approximately 75 percent of the known nesting habitat for sage grouse, and that habitat is protected only on a seasonal basis. As more information becomes available, the extent and location of habitat will change, based on the habitat associated with each strutting ground. (Each strutting ground, about 126 acres, is currently protected by a "no surface occupancy" restriction.)

Finally, because oil and gas exploration is reviewed on a case-by-case basis, exploration activity would not be restricted by wildlife concerns in areas that are not, at the time of exploration, potential habitat for a particular species. With properly managed, reasonable, seasonal restriction, both exploration and wildlife protection can occur.

16-5 Detailed, program-by-program discussions of mitigations are not included for these reasons: (a) During the development of alternatives, prescriptions that were included in one alternative often mitigated the impacts of prescriptions in one or more other alternatives. (b) Mitigations which are essentially standard operating procedures and are included in Bureau manuals, instruction memoranda, and handbooks were not reprinted because they are widely available for public review and are regularly and consistently applied. (c) In a general, summary document such as this, it is not possible or practical to develop specific mitigations for individual programs to be used in specific cases. However, guidelines for certain types of activities in specific wildlife habitats have been included in Appendix F. Mitigations for program specific or site specific impacts are identified through the environmental assessment process and in the development of activity plans.



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OF
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17

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Endangered Species, Field Office
Federal Bldg., U.S. Courthouse
301 South Park
P.O. Box 10023
Helena, Montana 59626

IN REPLY REFER TO:
W.02 Washakie RMP

December 24, 1986

MEMORANDUM

To: State Director, BLM, Wyoming State Office, Cheyenne, WY

From: Acting Field Supervisor, FWS, Endangered Species, Helena, MT

Subject: Washakie Resource Management Plan Biological Assessment

We have reviewed your biological assessment (BA) and Washakie Resource Management Plan (RMP) Draft Environmental Impact Statement. We concur with your determination that the preferred alternative will not effect the endangered bald eagle (Haliaeetus leucocephalus), peregrine falcon (Falco peregrinus), and black-footed ferret (Mustela nigripes). Our concurrence is based upon commitments in the BA and RMP to consult with us on future management actions, and the Washakie Resource Area's continued efforts to protect endangered species and their habitats.

Due to the general nature of RMP's and the broad spectrum of activities such plans cover, we realize it is impossible to identify site-specific and cumulative impacts of all programs and/or activities to endangered species. We believe the Washakie Resource Area has done a commendable job of trying to identify potential future threats to endangered species and committing to consider endangered species and consult with us if necessary for all activities on occupied and/or potential endangered species habitat.

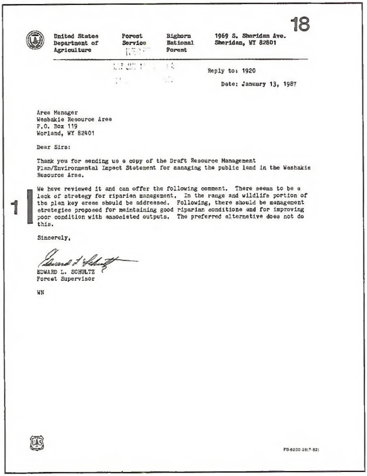
We appreciate your efforts to meet your joint responsibilities under the Endangered Species Act.

Ronald A. Carter

cc: ES, FWS, Cheyenne, WY
WG&F, Lander, WY

CTaylor/clh

"Take Pride in America"



18

United States Department of Agriculture
Forest Service
Bighorn National Forest
1969 S. Sheridan Ave.
Sheridan, WY 82801

Reply to: 1920

Date: January 13, 1987

Area Manager
Washakie Resource Area
P.O. Box 119
Worland, WY 82401

Dear Sirs:

Thank you for sending us a copy of the Draft Resource Management Plan/Environmental Impact Statement for managing the public land in the Washakie Resource Area.

1 We have reviewed it and can offer the following comment. There seems to be a lack of strategy for riparian management. In the range and wildlife portion of the plan key areas should be addressed. Following, there should be management strategies proposed for maintaining good riparian conditions and for improving poor condition with associated outputs. The preferred alternative does not do this.

Sincerely,

Edward L. Schultz
EDWARD L. SCHULTZ
Forest Supervisor

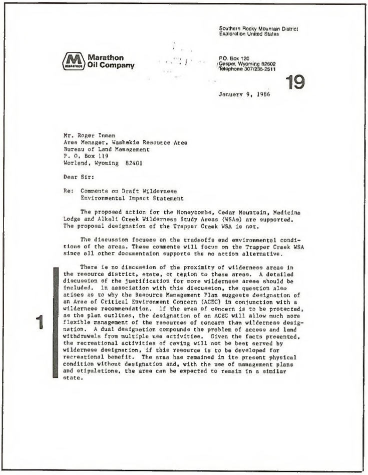
WN

FS-6200-28(7-82)

Response to Letter 18

18-1 The management of wetland/riparian areas to maintain and improve habitat condition was made an objective common to all alternatives. This objective is to be achieved through implementation of new grazing systems and projects within the range management program and through implementation of projects by the wildlife and soil and water management programs pursuant to the West Slope and Bighorn River habitat management plans. Each alternative analyzed has a different rate of project implementation and revision or completion of allotment management plans, but all alternatives provide for the maintenance and improvement of riparian areas. The priorities for action under each of the alternatives would be those areas that remain in poor condition or exhibit a downward trend under selected grazing treatments. We believe the general guidance provided in this RMP/EIS will allow the BLM to attain the goal of reversing the downward trend of riparian zones on public lands in the Washakie Resource Area.

Riparian areas in the planning area will be used as key areas to monitor the effects of grazing in wetland/riparian zones in each allotment. We fully recognize that more specific key areas within wetland/riparian areas must be established if these valuable habitats are to receive proper management. By establishing wetland/riparian key areas in most allotments, we will ensure collection of the data necessary to determine riparian habitat trend and condition. This will allow us to identify areas in need of more intensive management, and to ensure that riparian areas are maintained in good condition.



Southern Rocky Mountain District
Exploration United States

Marathon Oil Company

P.O. Box 120
Casper, Wyoming 82602
Telephone 307/235-2511

19

January 9, 1986

Mr. Roger Inman
Area Manager, Washakie Resource Area
Bureau of Land Management
P. O. Box 119
Worland, Wyoming 82401

Dear Sir:

Re: Comments on Draft Wilderness
Environmental Impact Statement

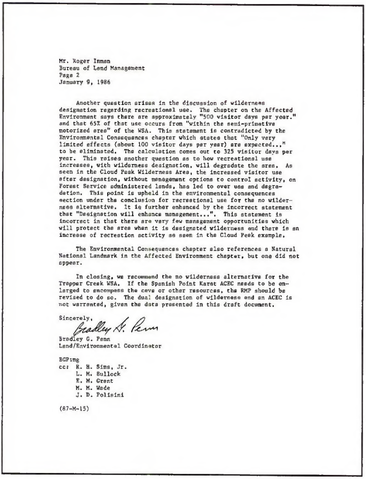
The proposed action for the Honeycombs, Cedar Mountain, Medicine Lodge and Alkali Creek Wilderness Study Areas (WSAs) are supported. The proposal designation of the Trapper Creek WSA is not.

The discussion focuses on the tradeoffs and environmental conditions of the areas. These comments will focus on the Trapper Creek WSA since all other documentaion supports the no action alternative.

1 There is no discussion of the proximity of wilderness areas in the resource district, state, or region to these areas. A detailed discussion of the justification for more wilderness areas should be included. In association with this discussion, the question also arises as to why the Resource Management Plan suggests designation of an Area of Critical Environment Concern (ACEC) in conjunction with a wilderness recommendation. If the area of concern is to be protected, as the plan outlines, the designation of an ACEC will allow much more flexible management of the resources of concern than wilderness designation. A dual designation compounds the problem of access and land withdrawals from multiple use activities. Given the facts presented, the recreational activities of caving will not be best served by wilderness designation, if this resource is to be developed for recreational benefit. The area has remained in its present physical condition without designation and, with the use of management plans and stipulations, the area can be expected to remain in a similar state.

Response to Letter 19

19-1 The overlapping proposed ACEC and Wilderness designations each have a purpose under existing laws and regulations. Existing ACEC regulations and guidelines do, in fact, allow an ACEC designation to be placed over any other existing land use designation in order to effectively manage the resources identified in the ACEC proposal. Wilderness designations result after a very rigid set of legislatively required steps are documented and reported to the public concerning an area's wilderness characteristics. An ACEC is designated to highlight an important and relevant resource that requires special management to protect that resource, which in the case of the Spanish Point area is karst topography and groundwater quality. Even if the Trapper Creek WSA is ultimately designated by Congress to be added to the National Wilderness Preservation System, wilderness management guidelines may, in fact, not adequately address the potential conflicts between the uses of the wilderness area and water quality within the proposed Spanish Point Karst ACEC. The potential conflicts between increased recreation use, for



Mr. Roger Inman
Bureau of Land Management
Page 2
January 9, 1986

Another question arises in the discussion of wilderness designation regarding recreational use. The chapter on the Affected Environment says there are approximately "500 visitor days per year." and that 65% of that use occurs from "within the semi-primetive motorized area" of the WSA. This statement is contradicted by the Environmental Consequences chapter which states that "Only very limited effects (about 100 visitor days per year) are expected..." to be eliminated. The calculation comes out to 325 visitor days per year. This raises another question as to how recreational use increases, with wilderness designation, will degradate the area. As seen in the Cloud Peak Wilderness Area, the increased visitor use after designation, without management options to control activity, on Forest Service administered lands, has led to over use and degradation. This point is upheld in the environmental consequences section under the conclusion for recreational use for the no wilderness alternative. It is further enhanced by the incorrect statement that "Designation will enhance management...". This statement is incorrect in that there are very few management opportunities which will protect the area when it is designated wilderness and there is an increase of recreation activity as seen in the Cloud Peak example.

The Environmental Consequences chapter also references a Natural National Landmark in the Affected Environment chapter, but one did not appear.

In closing, we recommend the no wilderness alternative for the Trapper Creek WSA. If the Spanish Point Karst ACEC needs to be enlarged to encompass the cave or other resources, the RMP should be revised to do so. The dual designation of wilderness and an ACEC is not warranted, given the data presented in this draft document.

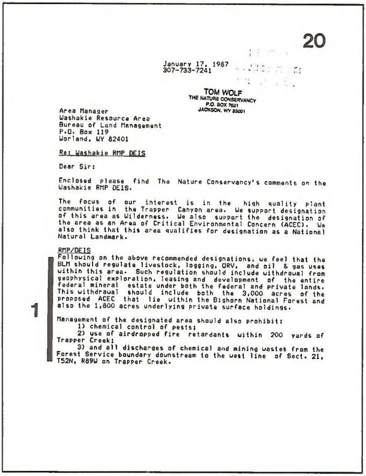
Sincerely,

Bradley G. Penn

Bradley G. Penn
Land/Environmental Coordinator

BGP:mg
cc: R. H. Sims, Jr.
L. M. Bullock
E. M. Grant
M. M. Wade
J. D. Polisini

(87-M-15)



20

January 17, 1987
307-733-7241

TOM WOLF
THE NATURE CONSERVANCY
P.O. BOX 7821
JACKSON, WY 83001

Area Manager
Washakie Resource Area
Bureau of Land Management
P.O. Box 119
Worland, WY 82401

Re: Washakie RMP DEIS

Dear Sir:

Enclosed please find The Nature Conservancy's comments on the Washakie RMP DEIS.

The focus of our interest is in the high quality plant communities in the Trapper Canyon area. We support designation of this area as Wilderness. We also support the designation of the area as an Area of Critical Environmental Concern (ACEC). We also think that this area qualifies for designation as a National Natural Landmark.

RMP/DEIS

1 Following on the above recommended designations, we feel that the BLM should regulate livestock, logging, ORV, and oil & gas uses within this area. Such regulation should include withdrawal from geophysical exploration, leasing and development of the entire federal mineral estate under both the federal and private lands. This withdrawal should include both the 3,000 acres of the proposed ACEC that lie within the Bighorn National Forest and also the 1,800 acres underlying private surface holdings.

Management of the designated area should also prohibit:
1) chemical control of pests;
2) use of airdropped fire retardants within 200 yards of Trapper Creek;
3) and all discharges of chemical and mining wastes from the Forest Service boundary downstream to the west line of Sect. 21, T52N, R89W on Trapper Creek.

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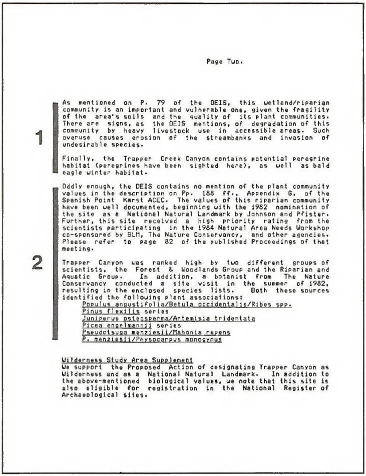
example, and water quality are described on page 117 of the Draft Wilderness EIS. The ACEC management prescriptions, in relation to water quality and karst resources, would have to be considered in any future wilderness management plan for the Trapper Creek WSA.

Response to Letter 20

20-1 Restrictions on surface activities (such as geophysical exploration) can be applied only to public land surface managed by the BLM. The restriction of surface activities on private surface or on the Bighorn National Forest is not within the jurisdiction of the BLM. As explained in the Preferred Alternative, we do hope to formulate cooperative management agreements with other landowners in the proposed Spanish Point Karst ACEC to promote a consistent surface management policy for the entire ACEC.

20-2 Plant community values in the proposed Spanish Point Karst ACEC are important and have high value. However, water and cave resources were the motivating factor in the proposed designation of the ACEC. The priority given these communities by the 1984 Natural Area Needs Workshop supports the need for an ACEC in the area, and surely will be a consideration in determining the management of the area.



Page Two.

1 As mentioned on P. 79 of the DEIS, this wetland/riparian community is an important and vulnerable one, given the fragility of the area's soils and the quality of its plant communities. There are signs, as the DEIS mentions, of degradation of this community by heavy livestock use in accessible areas. Such overuse causes erosion of the streambanks and invasion of undesirable species.

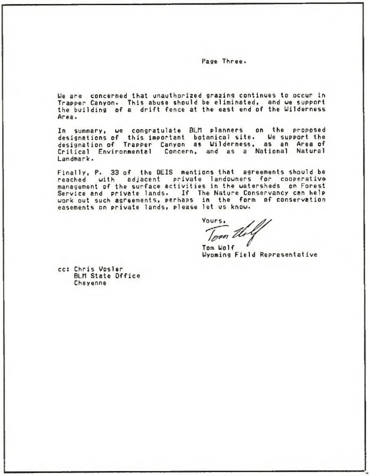
Finally, the Trapper Creek Canyon contains potential peregrine habitat (peregrines have been sighted here), as well as bald eagle winter habitat.

2 Oddly enough, the DEIS contains no mention of the plant community values in the description on Pp. 188 ff., Appendix G, of the Spanish Point Karst ACEC. The values of this riparian community have been well documented, beginning with the 1982 nomination of the site as a National Natural Landmark by Johnson and Pfister. Further, this site received a high priority rating from the scientists participating in the 1984 Natural Area Needs Workshop co-sponsored by BLM, The Nature Conservancy, and other agencies. Please refer to page 82 of the published Proceedings of that meeting.

Trapper Canyon was ranked high by two different groups of scientists, the Forest & Woodlands Group and the Riparian and Aquatic Group. In addition, a botanist from The Nature Conservancy conducted a site visit in the summer of 1982, resulting in the enclosed species lists. Both these sources identified the following plant associations:

Populus angustifolia/Betula occidentalis/Ribes spp.
Pinus flexilis series
Juniperus osteosperma/Artemisia tridentata
Picea engelmannii series
Pseudotsuga menziesii/Mahonia repens
P. menziesii/Physocarpus monogynus

Wilderness Study Area Supplement
We support the Proposed Action of designating Trapper Canyon as Wilderness and as a National Natural Landmark. In addition to the above-mentioned biological values, we note that this site is also eligible for registration in the National Register of Archaeological sites.



Page Three.

We are concerned that unauthorized grazing continues to occur in Trapper Canyon. This abuse should be eliminated, and we support the building of a drift fence at the east end of the Wilderness Area.

In summary, we congratulate BLM planners on the proposed designations of this important botanical site. We support the designation of Trapper Canyon as Wilderness, as an Area of Critical Environmental Concern, and as a National Natural Landmark.

Finally, P. 33 of the DEIS mentions that agreements should be reached with adjacent private landowners for cooperative management of the surface activities in the watersheds on Forest Service and private lands. If The Nature Conservancy can help work out such agreements, perhaps in the form of conservation easements on private lands, please let us know.

Yours,

Tom Wolf

Tom Wolf
Wyoming Field Representative

cc: Chris Vosler
BLM State Office
Cheyenne

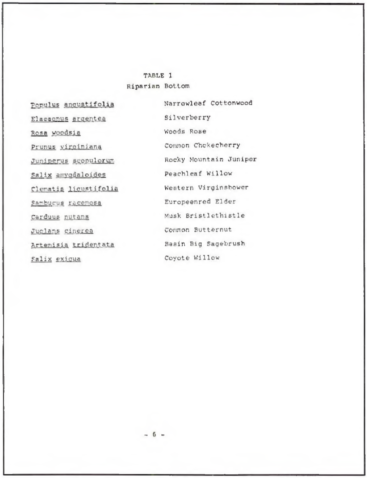


TABLE 1

Riparian Bottom

Populus angustifolia	Narrowleaf Cottonwood
Elaeagnus argentea	Silverberry
Rosa woodsia	Woods Rose
Prunus virginiana	Common Chokecherry
Juniperus scopulorum	Rocky Mountain Juniper
Salix amygdaloides	Peachleaf Willow
Clematis ligustifolia	Western Virginsbower
Sambucus racemosa	Europeenred Elder
Carduus nutans	Musk Bristlethistle
Juglans cinerea	Common Butternut
Artemisia tridentata	Basin Big Sagebrush
Salix exigua	Coyote Willow

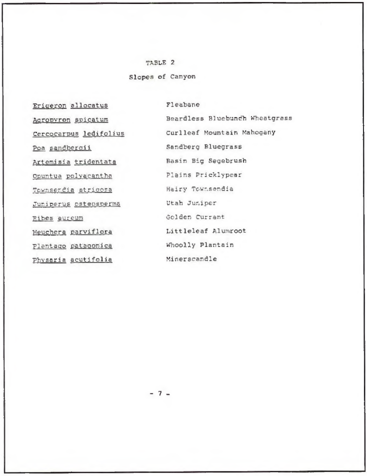


TABLE 2

Slopes of Canyon

Erigeron allocatus	Fleabane
Agropyron spicatum	Beardless Bluebunch Wheatgrass
Cercocarpus ledifolius	Curlleaf Mountain Mahogany
Poa sandbergii	Sandberg Bluegrass
Artemisia tridentata	Basin Big Segebrush
Opuntua polyacantha	Plains Pricklypear
Townsendia strigosa	Hairy Townsendia
Juniperus osteosperma	Utah Juniper
Ribes aureum	Golden Currant
Heuchera parviflora	Littleleaf Alumroot
Plantago patagonica	Whoolly Plantain
Physaria acutifolia	Minerscandle

TABLE 3

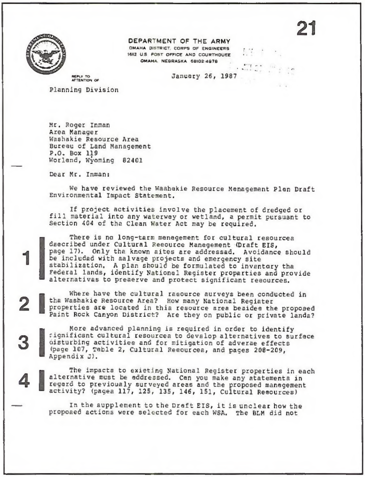
Riparian Bottom

Populus angustifolia	Narrowleaf Cottonwood
Betula occidentalis	Water Birch
Actaea rubra	Red Baneberry
Epilobium alpinum	Alpine Willowherb
Stipa viridula	Green Needlegrass
Rubus idaeus	Red Raspberry
Mertensia ciliata	Mountain Bluebells
Cornus stolonifera	Redosier Dogwood
Smilacina stellata	Starry Falsesolomonseal
Agropyron spicatum	Beardless Bluebunch Wheatgrass
Aster occidentalis	Aster
Mentha arvensis	Field Mint
Osmorhiza chilensis	Spreading Sweetroot
Artemisia ludoviciana	Louisiana Sagewort
Salix exigua	Coyote Willow
Mimulus guttatus	Monkeyflower
Equisetum variegatum	Variegated Horsetail

TABLE 4

East End Of Canyon

Picea engelmannii	Engelmann Spruce
Carex egglestoni	Eggleston Sedge
Poa pratensis	Kentucky Bluegrass
Artemisia tridentata	Basin Big Sagebrush
Equisetum arvense	Field Horsetail
Ribes cereum	Wax Currant
Pinus contorta	Lodgepole Pine



21

DEPARTMENT OF THE ARMY
OMAHA DISTRICT, CORPS OF ENGINEERS
1612 U.S. POST OFFICE AND COURTHOUSE
OMAHA, NEBRASKA 68102-4978

REPLY TO
ATTENTION OF

Planning Division

January 26, 1987

Mr. Roger Inman
Area Manager
Washakie Resource Area
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Inman:

We have reviewed the Washakie Resource Management Plan Draft Environmental Impact Statement.

If project activities involve the placement of dredged or fill material into any waterway or wetland, a permit pursuant to Section 404 of the Clean Water Act may be required.

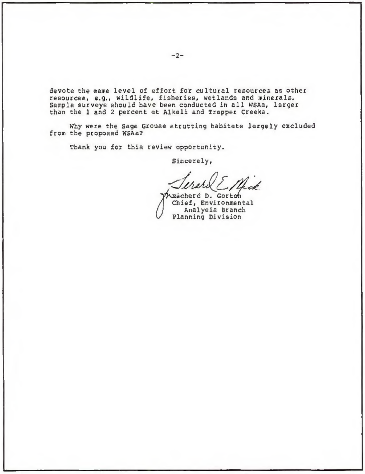
1 There is no long-term management for cultural resources described under Cultural Resource Management (Draft EIS, page 17). Only the known sites are addressed. Avoidance should be included with salvage projects and emergency site stabilization. A plan should be formulated to inventory the Federal lands, identify National Register properties and provide alternatives to preserve and protect significant resources.

2 Where have the cultural resource surveys been conducted in the Washakie Resource Area? How many National Register properties are located in this resource area besides the proposed Paint Rock Canyon District? Are they on public or private lands?

3 More advanced planning is required in order to identify significant cultural resources to develop alternatives to surface disturbing activities and for mitigation of adverse effects (page 107, Table 2, Cultural Resources, and pages 208-209, Appendix J).

4 The impacts to existing National Register properties in each alternative must be addressed. Can you make any statements in regard to previously surveyed areas and the proposed management activity? (pages 117, 125, 135, 146, 151, Cultural Resources)

In the supplement to the Draft EIS, it is unclear how the proposed actions were selected for each WSA. The BLM did not



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devote the same level of effort for cultural resources as other resources, e.g., wildlife, fisheries, wetlands and minerals. Sample surveys should have been conducted in all WSAs, larger than the 1 and 2 percent at Alkali and Trapper Creeks.

Why were the Sage Grouse strutting habitats largely excluded from the proposed WSAs?

Thank you for this review opportunity.

Sincerely,

Gerard E. Mick
for Richard D. Gorton
Chief, Environmental
Analysis Branch
Planning Division

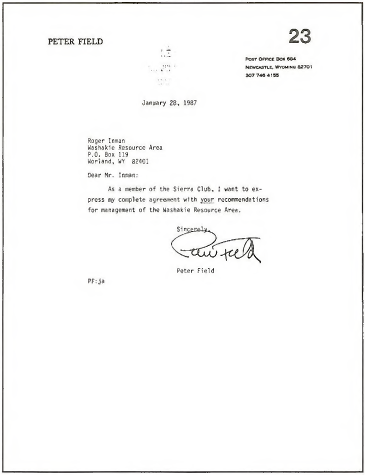
Response to Letter 21

21-1 The discussion of management common to all alternatives (page 17 of the Draft RMP/EIS) describes long-term management of cultural resources. While known sites are addressed specifically, paragraph 2 states that additional sites needing salvage or stabilization would be identified in Class III (intensive) inventories in the future. Cultural resources are also addressed in prescriptions proposed for other programs. For example, the avoidance of cultural resources is addressed relative to the designation of corridors under "Land and Realty Management." Our cultural surveys are primarily limited to the evaluation of proposed BLM projects which result in surface disturbance.

21-2 Cultural resource inventories have been conducted throughout the Washakie Resource Area (WRA). Areas where inventories have been concentrated include the West Slope of the Bighorn Mountains, the Cottonwood Creek Oil Field, and in Trapper and Paint Rock canyons. Inventories are done usually in response to surface disturbing projects proposed by industry or by the BLM. There are 624 known sites in the WRA; 130 are eligible for the National Register. About 98 percent are on public lands (refer to page 94 of the Draft RMP/EIS and to the clarification of that text).

21-3 All surface disturbing project proposals are subject to Class III inventories prior to project approval. Planning and inventories on BLM projects (e.g., projects in the range and wildlife programs) are often completed up to two years ahead of the commencing of projects. Planning on industry projects is more constrained because we can only respond to proposals, and we are bound by other regulations. For example, in mine expansion, 43 CFR 3809 states that we have only 30 days to respond to an industry request; in reality, we have long-term agreements with mining companies to conduct inventories at least a year in advance. However, plans do change, and cultural resource planning does not always have the lead time we would prefer. The adverse impacts identified on page 209 of the Draft RMP/EIS are usually beyond our control and mitigation opportunities are limited, as a result.

21-4 There are no National Register properties on BLM administered public lands in the Washakie Resource Area.



23

PETER FIELD

Post Office Box 684
Newcastle, Wyoming 82701
307 746 4155

January 28, 1987

Roger Inman
Washakie Resource Area
P.O. Box 119
Worland, WY 82401

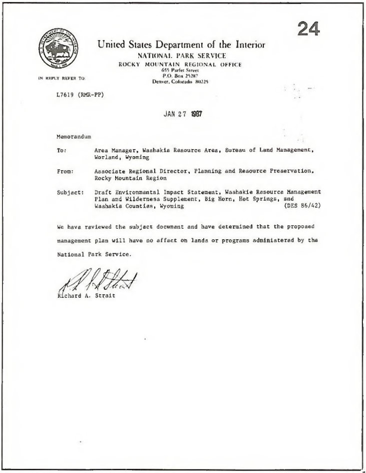
Dear Mr. Inman:

As a member of the Sierra Club, I want to express my complete agreement with your recommendations for management of the Washakie Resource Area.

Sincerely,

Peter Field

PF:ja



24

United States Department of the Interior
NATIONAL PARK SERVICE
ROCKY MOUNTAIN REGIONAL OFFICE
655 Parfet Street
P.O. Box 25287
Denver, Colorado 80225

IN REPLY REFER TO:

L7619 (RMR-PP)

JAN 27 1987

Memorandum

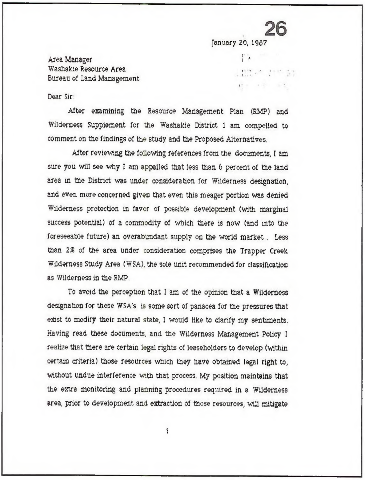
To: Area Manager, Washakie Resource Area, Bureau of Land Management, Worland, Wyoming

From: Associate Regional Director, Planning and Resource Preservation, Rocky Mountain Region

Subject: Draft Environmental Impact Statement, Washakie Resource Management Plan and Wilderness Supplement, Big Horn, Hot Springs, and Washakie Counties, Wyoming (DES 86/42)

We have reviewed the subject document and have determined that the proposed management plan will have no effect on lands or programs administered by the National Park Service.

Richard A. Strait



26

January 20, 1987

Area Manager
Washakie Resource Area
Bureau of Land Management

Dear Sir:

After examining the Resource Management Plan (RMP) and Wilderness Supplement for the Washakie District I am compelled to comment on the findings of the study and the Proposed Alternatives.

After reviewing the following references from the documents, I am sure you will see why I am appalled that less than 6 percent of the land area in the District was under consideration for Wilderness designation, and even more concerned given that even this meager portion was denied Wilderness protection in favor of possible development (with marginal success potential) of a commodity of which there is now (and into the foreseeable future) an overabundant supply on the world market . Less than 2% of the area under consideration comprises the Trapper Creek Wilderness Study Area (WSA), the sole unit recommended for classification as Wilderness in the RMP.

To avoid the perception that I am of the opinion that a Wilderness designation for these WSA's is some sort of panacea for the pressures that exist to modify their natural state, I would like to clarify my sentiments. Having read these documents, and the Wilderness Management Policy I realize that there are certain legal rights of leaseholders to develop (within certain criteria) those resources which they have obtained legal right to, without undue interference with that process. My position maintains that the extra monitoring and planning procedures required in a Wilderness area, prior to development and extraction of those resources, will mitigate

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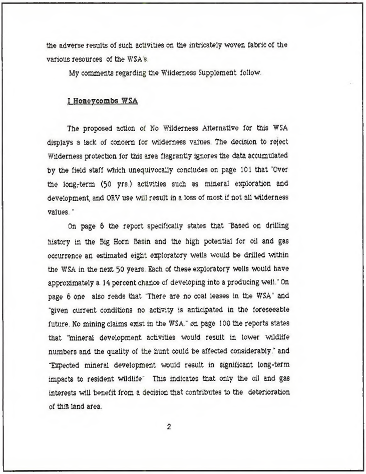


the adverse results of such activities on the intricately woven fabric of the various resources of the WSA's.

My comments regarding the Wilderness Supplement follow.

I Honeycombs WSA

The proposed action of No Wilderness Alternative for this WSA displays a lack of concern for wilderness values. The decision to reject Wilderness protection for this area flagrantly ignores the data accumulated by the field staff which unequivocally concludes on page 101 that "Over the long-term (50 yrs.) activities such as mineral exploration and development, and ORV use will result in a loss of most if not all wilderness values."

On page 6 the report specifically states that "Based on drilling history in the Big Horn Basin and the high potential for oil and gas occurrence an estimated eight exploratory wells would be drilled within the WSA in the next 50 years. Each of these exploratory wells would have approximately a 14 percent chance of developing into a producing well." On page 6 one also reads that "There are no coal leases in the WSA" and "given current conditions no activity is anticipated in the foreseeable future. No mining claims exist in the WSA." on page 100 the reports states that "mineral development activities would result in lower wildlife numbers and the quality of the hunt could be affected considerably." and "Expected mineral development would result in significant long-term impacts to resident wildlife" This indicates that only the oil and gas interests will benefit from a decision that contributes to the deterioration of this land area.

2

Response to Letter 26

26-1 Planning questions relating to the four planning issues have been addressed throughout the plan. There may be instances where the complete answer to a planning question consists of parts of several prescriptions for more than one program.

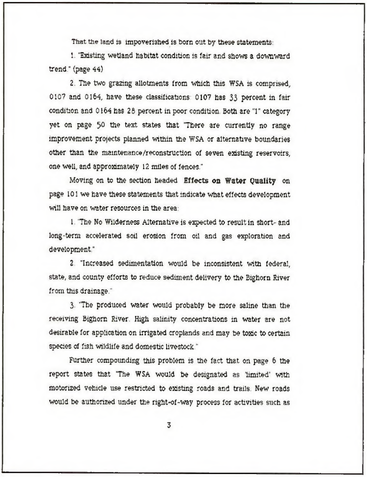
The planning questions for Issues #1 and #2 identified in this letter and listed on pages 6 and 7 of the Draft RMP/EIS were addressed in the plan as follows and are restated at the beginning of each response.

Issue #1, Question #1: (Where and under what conditions should timber management be pursued?) Timber would be harvested from areas classified as commercial forest land and harvesting would be conducted in a manner that would include benefits to watershed, wildlife, or wetland/riparian habitat (management common to all alternatives, p. 16). Levels of timber harvest were addressed in all alternatives. In the Preferred Alternative, up to 1 million board feet would be harvested annually, subject to the rather detailed list of constraints listed in the alternative. In addition, no harvest of forest products was considered as an alternative but was eliminated from detailed study.

Issue #1, Question #3: (What livestock stocking levels are appropriate and what accommodations need to be made in order to provide for big game populations?) A range of maximum, resource area-wide stocking levels was analyzed. In the Preferred Alternative, for example, the maximum level would be 143,000 AUM's. Pursuant to BLM policy, stocking levels for individual allotments would not be revised unless adequate data is gathered through monitoring to support an adjustment (page 27 of the Draft) except when an adjustment is agreed to by a permittee or lessee. Monitoring will continue indefinitely. Current stocking levels are displayed by allotment in Appendix D. Those levels would generally remain in effect for at least the next 5 years.

Accommodations for big game populations generally are found in range and wildlife management discussions in "Management Common to All Alternatives." They are found in various forms such as development of projects in habitat management plans and allotment management plans, in changes of season of use, and in guidance found in Appendixes E and F.

Issue #1, Question #5: (What areas are suitable for livestock grazing? What management practices should apply and where should they be applied?) Until monitoring is



That the land is impoverished is born out by these statements:

1. "Existing wetland habitat condition is fair and shows a downward trend." (page 44)

2. The two grazing allotments from which this WSA is comprised, 0107 and 0164, have these classifications: 0107 has 33 percent in fair condition and 0164 has 28 percent in poor condition. Both are "I" category yet on page 50 the text states that "There are currently no range improvement projects planned within the WSA or alternative boundaries other than the maintenance/reconstruction of seven existing reservoirs, one well, and approximately 12 miles of fences."

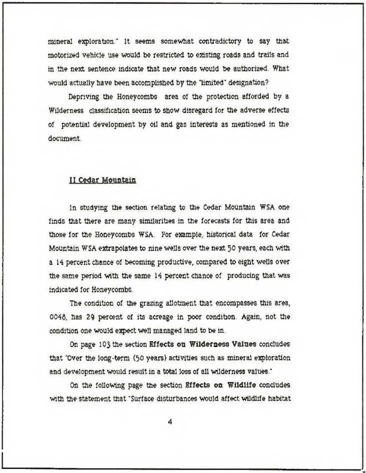
Moving on to the section headed **Effects on Water Quality** on page 101 we have these statements that indicate what effects development will have on water resources in the area:

1. "The No Wilderness Alternative is expected to result in short- and long-term accelerated soil erosion from oil and gas exploration and development."

2. "Increased sedimentation would be inconsistent with federal, state, and county efforts to reduce sediment delivery to the Bighorn River from this drainage."

3. "The produced water would probably be more saline than the receiving Bighorn River. High salinity concentrations in water are not desirable for application on irrigated croplands and may be toxic to certain species of fish wildlife and domestic livestock."

Further compounding this problem is the fact that on page 6 the report states that "The WSA would be designated as 'limited' with motorized vehicle use restricted to existing roads and trails. New roads would be authorized under the right-of-way process for activities such as



mineral exploration." It seems somewhat contradictory to say that motorized vehicle use would be restricted to existing roads and trails and in the next sentence indicate that new roads would be authorized. What would actually have been accomplished by the "limited" designation?

Depriving the Honeycombs area of the protection afforded by a Wilderness classification seems to show disregard for the adverse effects of potential development by oil and gas interests as mentioned in the document.

II Cedar Mountain

In studying the section relating to the Cedar Mountain WSA one finds that there are many similarities in the forecasts for this area and those for the Honeycombs WSA. For example, historical data for Cedar Mountain WSA extrapolates to nine wells over the next 50 years, each with a 14 percent chance of becoming productive, compared to eight wells over the same period with the same 14 percent chance of producing that was indicated for Honeycombs.

The condition of the grazing allotment that encompasses this area, 0048, has 29 percent of its acreage in poor condition. Again, not the condition one would expect well managed land to be in.

On page 103 the section **Effects on Wilderness Values** concludes that "Over the long-term (50 years) activities such as mineral exploration and development would result in a total loss of all wilderness values."

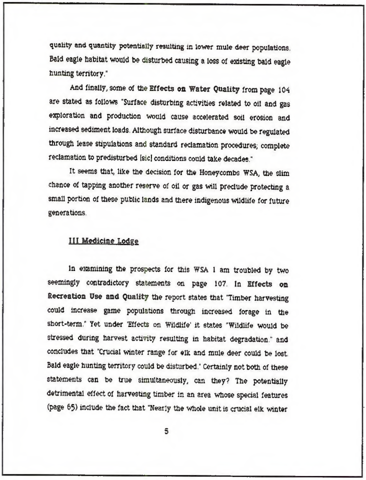
On the following page the section **Effects on Wildlife** concludes with the statement that "Surface disturbances would affect wildlife habitat

conducted, all allotments in the resource area are suitable for livestock grazing. However, there are areas within each allotment that may not be suitable for grazing, either in terms of location (such as wetland/riparian or barren areas), time or duration of use. These areas have been addressed in a number of ways, including changes in season of use, fencing of wetland/riparian areas, and in Appendix E.

Issue #1, Question #6: (Where and in what condition should elk habitat be managed in the Washakie Resource Area?) Identified elk habitat would be managed to accomplish the goal of increasing habitat quality concurrent with an increase in habitat availability (page 18 of the Draft). This would be accomplished through the use of the general guidelines described on page 18, as well as such things as using forest management to accomplish needed changes in habitat, changes in grazing use, restrictions on access and use of ORVs, and seasonal restrictions on oil and gas exploration and other surface disturbing activities (all parts of the Preferred Alternative).

Issue #1, Question #7: (What management practices or restrictions are needed to maintain or improve habitat for elk, mule deer, antelope, sage grouse, and trout? In what areas of the resource area will these management practices or restrictions be applied?) The response to this question is similar to response for question #6. In terms of specific management practices, we indicate in "Management Common to All Alternatives" that the West Slope Habitat Management Plan (HMP) would be expanded to include the portion of the resource area not presently covered by the HMP. That plan, with the Bighorn River HMP, covers the entire resource area. The goals of those HMPs, along with the specific practices and projects identified, would be used to manage and improve habitat.

Issue #1, Question #9: (What vegetative uses and management practices should be allowed on wetland/riparian and aquatic habitat?) Vegetative uses and management practices for wetland/riparian and aquatic habitat for the Preferred Alternative are described in many places, including on pages 18, 21, 24, 25, 27, 28, 29, 32, 33, and 34 of the Draft RMP/EIS. The prescriptions on those pages relate to the protection and/or enhancement of wetland/riparian areas in the context of management of fish and wildlife resources, fire management, geophysical exploration, lands and realty, forest management, range management, ORV management, and soil and water management.



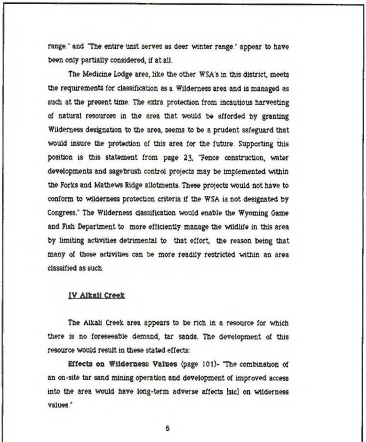
quality and quantity potentially resulting in lower mule deer populations. Bald eagle habitat would be disturbed causing a loss of existing bald eagle hunting territory."

And finally, some of the **Effects on Water Quality** from page 104 are stated as follows "Surface disturbing activities related to oil and gas exploration and production would cause accelerated soil erosion and increased sediment loads. Although surface disturbance would be regulated through lease stipulations and standard reclamation procedures; complete reclamation to predisturbed [sic] conditions could take decades."

It seems that, like the decision for the Honeycombs WSA, the slim chance of tapping another reserve of oil or gas will preclude protecting a small portion of these public lands and there indigenous wildlife for future generations.

III Medicine Lodge

In examining the prospects for this WSA I am troubled by two seemingly contradictory statements on page 107. In **Effects on Recreation Use and Quality** the report states that "Timber harvesting could increase game populations through increased forage in the short-term." Yet under 'Effects on Wildlife' it states "Wildlife would be stressed during harvest activity resulting in habitat degradation." and concludes that "Crucial winter range for elk and mule deer could be lost. Bald eagle hunting territory could be disturbed." Certainly not both of these statements can be true simultaneously, can they? The potentially detrimental effect of harvesting timber in an area whose special features (page 65) include the fact that "Nearly the whole unit is crucial elk winter



range." and "The entire unit serves as deer winter range." appear to have been only partially considered, if at all.

The Medicine Lodge area, like the other WSA's in this district, meets the requirements for classification as a Wilderness area and is managed as such at the present time. The extra protection from incautious harvesting of natural resources in the area that would be afforded by granting Wilderness designation to the area, seems to be a prudent safeguard that would insure the protection of this area for the future. Supporting this position is this statement from page 23, "Fence construction, water developments and sagebrush control projects may be implemented within the Forks and Mathews Ridge allotments. These projects would not have to conform to wilderness protection criteria if the WSA is not designated by Congress." The Wilderness classification would enable the Wyoming Game and Fish Department to more efficiently manage the wildlife in this area by limiting activities detrimental to that effort, the reason being that many of those activities can be more readily restricted within an area classified as such.

IV Alkali Creek

The Alkali Creek area appears to be rich in a resource for which there is no foreseeable demand, tar sands. The development of this resource would result in these stated effects:

Effects on Wilderness Values (page 101)- "The combination of an on-site tar sand mining operation and development of improved access into the area would have long-term adverse affects [sic] on wilderness values."

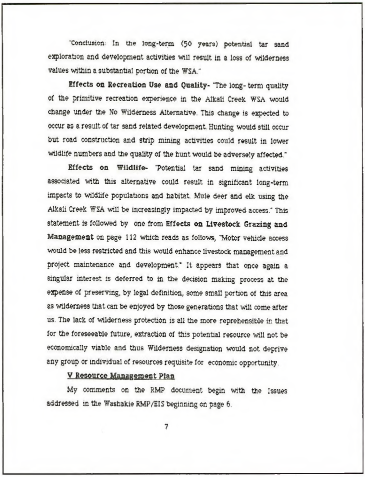
The other alternatives address wetland/riparian habitat in a similar manner.

26-2 Issue #2, Question #2: (What management practices or restrictions are needed to protect unique values in wilderness study areas that would not be recommended for wilderness designation?) The "no wilderness" alternatives described for each wilderness study area indicate that the management for the WSA's would be the management selected as the Preferred Alternative in the RMP/EIS. With the exception of the designation of the proposed Spanish Point Karst ACEC which overlies portions of the Trapper Creek and Medicine Lodge WSAs, no special management prescriptions were developed to be applied specifically to WSAs. Thus, the answer to planning question number 2 is that the prescriptions developed in the preferred alternative, including standard protective stipulations and other discretionary management, will be used to protect values in WSAs not recommended for designation.

26-3 Planning criteria are guidelines for the development of particular portions of the land use plan. As guidelines, they may be modified during planning and they may not always be strictly followed. Our analysis shows that under some of the alternatives, sufficient habitat to meet Wyoming Game and Fish Department Strategic Plan Goals would not be provided. This is due primarily to trade-offs among the various uses of the public lands. We have proposed changes in the Final RMP/EIS that address this concern and that would adjust livestock grazing and mineral-related use levels.

26-4 Two points of clarification need to be made relative to disposals and trespass. First, exchange is one method to resolve agricultural trespass or other occupancy trespass situations, e.g., public land that is being farmed or has a building constructed on it. Grazing trespass is much different and resolution does not involve the need for land disposal. Second, not all occupancy trespass is willful or even known until many years after it occurs, and may be the result of factors not within the control of the current occupant.

The regulations against trespass are enforced. Trespass must be settled before subsequent negotiations can proceed. Settlement may include eviction, authorization, or disposal. Since it is possible with an exchange to acquire values as great or greater than those given up, exchange is often the preferred management option in the event disposal is necessary to settle a trespass. Disposal by exchange must still meet suitability criteria, which are listed in Appendix B.



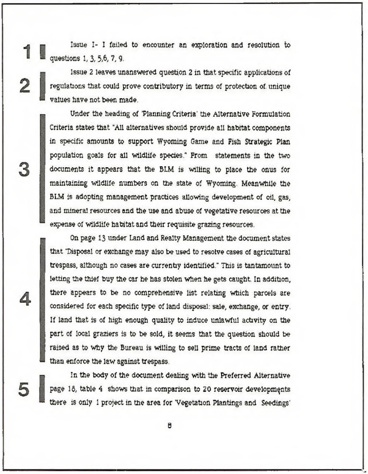
"Conclusion: In the long-term (50 years) potential tar sand exploration and development activities will result in a loss of wilderness values within a substantial portion of the WSA."

Effects on Recreation Use and Quality- "The long- term quality of the primitive recreation experience in the Alkali Creek WSA would change under the No Wilderness Alternative. This change is expected to occur as a result of tar sand related development. Hunting would still occur but road construction and strip mining activities could result in lower wildlife numbers and the quality of the hunt would be adversely affected."

Effects on Wildlife- "Potential tar sand mining activities associated with this alternative could result in significant long-term impacts to wildlife populations and habitat. Mule deer and elk using the Alkali Creek WSA will be increasingly impacted by improved access." This statement is followed by one from **Effects on Livestock Grazing and Management** on page 112 which reads as follows, "Motor vehicle access would be less restricted and this would enhance livestock management and project maintenance and development." It appears that once again a singular interest is deferred to in the decision making process at the expense of preserving, by legal definition, some small portion of this area as wilderness that can be enjoyed by those generations that will come after us. The lack of wilderness protection is all the more reprehensible in that for the foreseeable future, extraction of this potential resource will not be economically viable and thus Wilderness designation would not deprive any group or individual of resources requisite for economic opportunity.

V Resource Management Plan

My comments on the RMP document begin with the Issues addressed in the Washakie RMP/EIS beginning on page 6.



1 Issue I- I failed to encounter an exploration and resolution to questions 1, 3, 5,6, 7, 9.

2 Issue 2 leaves unanswered question 2 in that specific applications of regulations that could prove contributory in terms of protection of unique values have not been made.

3 Under the heading of 'Planning Criteria' the Alternative Formulation Criteria states that "All alternatives should provide all habitat components in specific amounts to support Wyoming Game and Fish Strategic Plan population goals for all wildlife species." From statements in the two documents it appears that the BLM is willing to place the onus for maintaining wildlife numbers on the state of Wyoming. Meanwhile the BLM is adopting management practices allowing development of oil, gas, and mineral resources and the use and abuse of vegetative resources at the expense of wildlife habitat and their requisite grazing resources.

4 On page 13 under Land and Realty Management the document states that "Disposal or exchange may also be used to resolve cases of agricultural trespass, although no cases are currentiy identified." This is tantamount to letting the thief buy the car he has stolen when he gets caught. In addition, there appears to be no comprehensive list relating which parcels are considered for each specific type of land disposal: sale, exchange, or entry. If land that is of high enough quality to induce unlawful activity on the part of local graziers is to be sold, it seems that the question should be raised as to why the Bureau is willing to sell prime tracts of land rather than enforce the law against trespass.

5 In the body of the document dealing with the Preferred Alternative page 18, table 4 shows that in comparison to 20 reservoir developments there is only 1 project in the area for 'Vegetation Plantings and Seedings'

26-5 Seedings and plantings are not needed to improve range condition unless there is not a seed source available for natural revegetation. The marginal success rate of those projects does not justify the expense. Grazing use adjustments in season, or class or number of livestock would improve much of the range condition in the resource area. Also, note the clarifications on this topic made on pages 34, 54, and 64 of the Draft RMP/EIS.

Reducing sagebrush cover may negatively impact some species of wildlife, while other species may derive benefits. If properly designed and carried out, sagebrush control can enhance wildlife habitat and increase forage production (refer to Appendix F for vegetation manipulation practices). Likewise, if properly designed and constructed, fences can improve livestock management and result in better ecological range condition, which may offset the negative impacts fencing may have on wildlife.

26-6 Comments noted, with one point of clarification with respect to grazing fees. Grazing fees in the recent past were established by the Secretaries of the Interior and Agriculture, based on a formula developed by the Congress in the Public Rangelands Improvement Act of 1978 (PRIA). Since the grazing fee provision of PRIA expired in 1985, the fee has been set by Executive Order.

5 in spite of the fact that over 26 percent of the acreage in the district is in fair and poor condition. The RMP states that nearly all of the 800 reservoirs were developed for livestock and of the 400 that hold water 60 percent are in poor condition and 20 percent in fair condition, yet only five have been fenced to exclude cattle. Causing further consternation is a statement on page 115, "Livestock grazing management and range development prescriptions would improve wildlife habitat. Fencing would impede big game movement and increase mortality especially in crucial big game winter ranges, migration routes,and parturition areas; and spraying sagebrush would reduce local wildlife populations that depend on sagebrush for food or cover." On page 27 under Range Management there are 8,100 acres projected for sagebrush spraying. Is it a fact that these acres are located where no wildlife will be effected?

On page 18, table 4 indicates that there are 75 riparian exclosure projects encompassing 1,060 acres and 75 "Other Fence Projects' totaling 15 miles for the district. Yet, page 28 states that "Eighteen existing AMP's are in various stages of implementation or revision. Implementation would continue until completion. Each year some of the 18 would be revised or new AMP's on "I" category allotments would be started. However, the total number worked on (existing and new) would average three AMP's per year." Given the inferior quality of much of the land in terms of overuse of vegetative resources and the resultant increase in erosion, the dearth of projects for Vegetation Planting and Seeding combined with an apparent shortage of trained field personnel, indicates that little appreciable improvement of the condition of the land in this district will take place in the foreseeable future. Further exacerbating this condition is the five years required for BLM personnel to authoritatively affect change in grazing

mangement on individual allotments. This, combined with the fact that the District budget shows no allocation for law enforcement, conspicuously eliminates the Bureau from effectively penalizing agricultural trespassers and other violators. At present there appears to be no mechanism or procedure in place by which the Bureau can effectively improve the quality of the rangeland in the District through enforcement of remedial management practices. This combined with an apparent lack of adequate financial resources budgeted to the district to allow a more accelerated rate of initiating AMP's would seem to dictate the need to protect as much of the land as possible with the aegis of a Wilderness classification.

The final section of this comment is drawn from Appendix J of the RMP. The section on 'Water' provides us with these statements for consideration: "Generally, the same activities that affect soils also affect surface water. Soil disturbances that cause erosion also increase sediment delivery to surface water. This "Increased sedimentation would degrade water quality and affect the whole food chain of aquatic life, from plants to invertebrates to fish. For example, increased sedimentation decreases sunlight transmission which results in decreased photosynthesis and production of plants and algae, important food sources for small fish and other aquatic life. Sedimentation also destroys fish spawning habitat, eggs, and fry, as well as invertebrates which form the foundation of the aquatic food pyramid. Water temperatures would increase and dissolved oxygen concentrations be reduced, both of which would cause direct mortalities to fish and other aquatic life. Some produced water discharges from oil and gas operations create additional aquatic habitat and make additional water available to irrigation. However, quality of discharged water may degrade the water quality of the receiving ephemeral or perennial stream enough to preclude its use for municipal drinking water, wildlife, recreation, and irrigation purposes."

"A potential impact on surface water could also come from oil spills." The impact is further described in this passage; "Oil spills and soil related chemicals entering aquatic habitats coat stream bottoms and riparian zones and the chemicals contaminate the water. This could kill fish and wildlife directly, cause chronic sickness among animals, or cause wildlife to move out of the affected [sic] areas. Affected [sic] wildlife includes birds and aquatic invertebrates, fish, and other cold-blooded animals which inhabit or depend upon the riparian zone for survival. Warm-blooded mammals such as beaver, muskrat and mink are probably harmed through contact or ingestion. Oil spills also cause a loss of feeding and spawning habitat for fish.

Some efforts to control oil spills such as constructing holding ponds, allowing access to spill or control sites, or burning riparian vegetation that is covered with oil may degrade riparian zones. For example, silt enters the waterway from annual wash-outs of the emergency holding ponds and runoff of denuded areas used to acquire soil for dam structures."

Under the section on 'Vegetation' the following statement concludes that "Wetlands would continue to be adversely affected, at least indirectly, by mineral development, lands and realty actions, timber management practices, wild horse and livestock grazing, ORV use and water projects. These activities tend to directly or indirectly cause such impacts as soil compaction, bank sloughing, streamside vegetation loss, channel widening, increased channel erosion, increased water temperature, increased sediments, reduced stream depth, lowered water table, loss of fish habitat, decreased fish spawning success, and lower fish population.

The result of the Proposed Alternative on 'Fish and Wildlife' is given on pages 202-204. Some highlights from this section that I would draw your attention to are:

"Actions which excavate, bury, overturn, clear, or grade previously undisturbed terrestrial habitat would continue to displace animals and cause indirect mortality to big game, small mammals, reptiles, and birds. Noises associated with these actions would cause the same effects. The construction of drill pads, roads, pumping stations, pipelines, power lines, reservoirs, fences, spring developments, and communication sites removes cover for wildlife. This cover is lost for the lifespan of the development, and in areas where sagebrush or timber is a major component of the vegetation, the loss of cover could last for more than thirty years after the site reclamation is completed. Loss of habitat would be expected to continue primarily in the sagebrush or grass vegetative type for oil and gas activity and in timbered areas for timber harvest. Livestock grazing would affect fish and wildlife habitat throughout the resource area, especially in crucial habitat and wetland/riparian areas.

In addition to direct loss of habitat by physical destruction, some wildlife would abandon habitat because of its proximity to human disturbance, noise, noxious odors, soil and water contamination, or use by other animals.

Construction of roads to timber sales or oil well pads in elk habitat may not leave enough buffer area between the roads and escape cover. Roads may cut across major trails and human use of these roads could inhibit elk movement, leading to habitat abandonment and over utilization of other portions of the habitat and reduction in carrying capacity.

Physical loss of native range vegetation caused by livestock grazing and mineral activities could result in the loss of big game forage, browse, and habitat. Human activities would disrupt animals, especially during the crucial winter and parturition periods.

Probably the greatest impact on bighorn sheep concerns forage competition and the tendency for livestock, elk, and people to displace the bighorn sheep from their traditional ranges. For example, there is an estimated 75 percent dietary overlap between bighorn sheep and cattle.

Since sage grouse depend on sagebrush for habitat, sagebrush eradication, as well as use of herbicides and insecticides, would significantly limit their population.

Existing conflicts between livestock and chukars or Hungarian partridge would continue to occur as a result of cover destruction and forage competition in riparian communities.

Under 'Visual Resources' these textual references stand out:

"The area's aesthetics would be affected by oil and gas activities, realty actions, timber activities, livestock grazing, ORV use, recreation use, and watershed projects."

"Thus, visual impacts in these areas would be fairly severe and long-standing."

And finally, 'Outdoor Recreation' concludes that:

"Noise, odors, noxious fumes, hazardous chemicals, access restrictions, and surface disturbances would all affect recreation activities because the opportunities for certain types of recreation would be lost, or the recreation experience would be degraded."

"... increased traffic might degrade the recreational experience of those who enjoy solitude. In addition, access to remote areas would also increase off-road vehicle activity and cause additional surface

disturbances. Hunting opportunities are often lost or reduced within areas of intensive development."

6 In summarizing my concerns I can't help but notice that grazing will continue on all the allotments at the current AUM levels. This is an extremely lucrative situation for those who retain these leases. Since the Grazing Fee Review and Evaluation Final Report 1979-1985 indicates that current fee formulations are based on "ability to pay" I find it inexcusable that the condition of the land is in a deteriorated state compared to its potential as defined by "climax plant community" under 'Ecologic Condition' in the glossary. If fees are to be based on "ability to pay" and the Bureau is not going to have the necessary funding and empowerment to induce leaseholders to change management practices and enforce current stipulations in the hope of ameliorating the effects of past and present grazing pressures, then it falls to the general taxpaying public to furnish the funds (through tax dollars) that enable the BLM to administer these public lands. This fact is all the more startling considering that the 1952 Independent Offices Appropriation Act required agencies such as the BLM to "be self-sustaining to the full extent possible." The act was further interpreted by the Office of Management and Budget to provide that "Where federally owned resources or property are leased or sold, a fair market value should be obtained." The Grazing Fee Review and Evaluation (1979-1985) on page 21states that "the 1983 indicated market value of grazing on public rangelands was $5.99 per head month, yet the fee charged the last two years was only $1.23. It appears from the decisions rendered by the higher echelons of the BLM administration that the interest of the taxpayers of this country were disregarded in an effort to sustain the subsidized grazing for a minority of beef producers in this

6 country. The Grazing Fee Review and Evaluation indicates that local graziers in the Washakie District are paying approximately 25 percent of the fair market value for their leases, and that nationwide, leaseholders produce only 2 percent of the beef in this country.

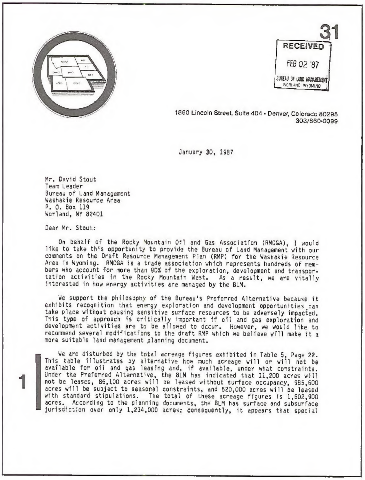
While I personally take no exception to grazing as a valid use of public land, it seems in this period of budget deficits (and attempts at every level of government to control spending) that these recipients of federal subsidies should be weaned from the trough of government funding and concurrently be required to yield their grazing practices to the oversight of the staff within the Bureau who have specialized in the various areas of expertise required to manage the land and its resources. This should be imperative given that this acknowledged minority of beef producers are recipients of federal assistance which gives them an obvious advantage over others competing in this same market. At present it appears, from decisions like these, that the Bureau exists only to rubber stamp the proposals of parties who would utilize one portion of the available resources without concern for other resources that may be adversely affected by their actions.

It appears after analysis of these documents that every effort has been made to accommodate select groups (which constitute a minority) at the exclusion of holding in public trust, land parcels which are undefiled and undeveloped, for future generations to enjoy. Under the Federal Land Policy and Management Act the mandate to the Bureau includes the instruction that "All public lands are to be managed so as to prevent unnecessary or undue degradation of the lands." The Bureau's own EIS for this district points out that if the Proposed Alternatives are adopted there will probably be 'unnecessary' and possibly 'undue degradation of the lands.'

It is my hope that those responsible for the decision to disallow Wilderness protection to the Honeycombs, Cedar Mountain, Alkali Creek and Medicine Lodge WSA's will reconsider their position on this matter and grant that extra measure of protection afforded by a Wilderness classification. I will also make every effort to enlist other organizations in an attempt to persuade Congress to preserve these areas from despoliation.

Respectfully Yours,

Melvin C Raab Jr.
4804 Briarfield Rd.
Columbia, SC 29206



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BUREAU OF LAND MANAGEMENT
WORLAND WYOMING

1860 Lincoln Street, Suite 404 • Denver, Colorado 80295
303/860-0099

January 30, 1987

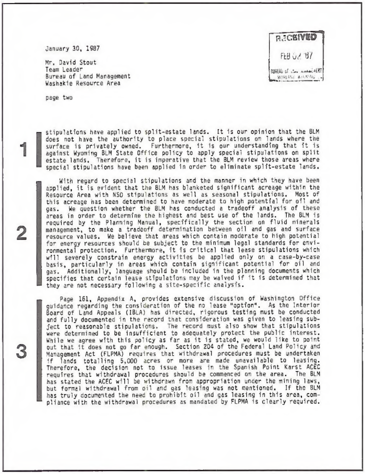
Mr. David Stout
Team Leader
Bureau of Land Management
Washakie Resource Area
P. O. Box 119
Worland, WY 82401

Dear Mr. Stout:

On behalf of the Rocky Mountain Oil and Gas Association (RMOGA), I would like to take this opportunity to provide the Bureau of Land Management with our comments on the Draft Resource Management Plan (RMP) for the Washakie Resource Area in Wyoming. RMOGA is a trade association which represents hundreds of members who account for more than 90% of the exploration, development and transportation activities in the Rocky Mountain West. As a result, we are vitally interested in how energy activities are managed by the BLM.

We support the philosophy of the Bureau's Preferred Alternative because it exhibits recognition that energy exploration and development opportunities can take place without causing sensitive surface resources to be adversely impacted. This type of approach is critically important if oil and gas exploration and development activities are to be allowed to occur. However, we would like to recommend several modifications to the draft RMP which we believe will make it a more suitable land management planning document.

1 We are disturbed by the total acreage figures exhibited in Table 5, Page 22. This table illustrates by alternative how much acreage will or will not be available for oil and gas leasing and, if available, under what constraints. Under the Preferred Alternative, the BLM has indicated that 11,200 acres will not be leased, 86,100 acres will be leased without surface occupancy, 985,600 acres will be subject to seasonal constraints, and 520,000 acres will be leased with standard stipulations. The total of these acreage figures is 1,602,900 acres. According to the planning documents, the BLM has surface and subsurface jurisdiction over only 1,234,000 acres; consequently, it appears that special



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January 30, 1987

Mr. David Stout
Team Leader
Bureau of Land Management
Washakie Resource Area

page two

1 stipulations have applied to split-estate lands. It is our opinion that the BLM does not have the authority to place special stipulations on lands where the surface is privately owned. Furthermore, it is our understanding that it is against Wyoming BLM State Office policy to apply special stipulations on split estate lands. Therefore, it is imperative that the BLM review those areas where special stipulations have been applied in order to eliminate split-estate lands.

2 With regard to special stipulations and the manner in which they have been applied, it is evident that the BLM has blanketed significant acreage within the Resource Area with NSO stipulations as well as seasonal stipulations. Most of this acreage has been determined to have moderate to high potential for oil and gas. We question whether the BLM has conducted a tradeoff analysis of these areas in order to determine the highest and best use of the lands. The BLM is required by the Planning Manual, specifically the section on fluid minerals management, to make a tradeoff determination between oil and gas and surface resource values. We believe that areas which contain moderate to high potential for energy resources should be subject to the minimum legal standards for environmental protection. Furthermore, it is critical that lease stipulations which will severely constrain energy activities be applied only on a case-by-case basis, particularly in areas which contain significant potential for oil and gas. Additionally, language should be included in the planning documents which specifies that certain lease stipulations may be waived if it is determined that they are not necessary following a site-specific analysis.

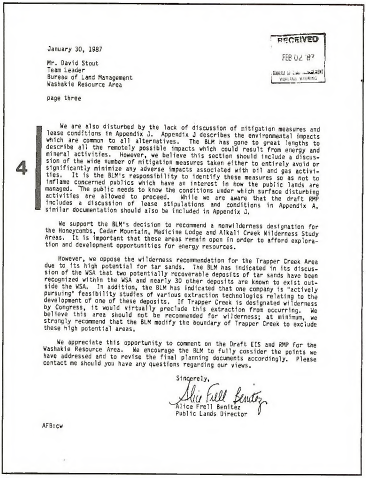
3 Page 161, Appendix A, provides extensive discussion of Washington Office guidance regarding the consideration of the no lease "option". As the Interior Board of Land Appeals (IBLA) has directed, rigorous testing must be conducted and fully documented in the record that consideration was given to leasing subject to reasonable stipulations. The record must also show that stipulations were determined to be insufficient to adequately protect the public interest. While we agree with this policy as far as it is stated, we would like to point out that it does not go far enough. Section 204 of the Federal Land Policy and Management Act (FLPMA) requires that withdrawal procedures must be undertaken if lands totalling 5,000 acres or more are made unavailable to leasing. Therefore, the decision not to issue leases in the Spanish Point Karst ACEC requires that withdrawal procedures should be commenced on the area. The BLM has stated the ACEC will be withdrawn from appropriation under the mining laws, but formal withdrawal from oil and gas leasing was not mentioned. If the BLM has truly documented the need to prohibit oil and gas leasing in this area, compliance with the withdrawal procedures as mandated by FLPMA is clearly required.

Response to Letter 31

31-1 In all alternatives, the acreage of the federal mineral estate in the planning area was used as the basis for the comparison of alternatives relative to oil and gas leasing. We have applied "special stipulations" to that total acreage in each alternative for purposes of analysis. "Special stipulations" in this regard refers to the Wyoming BLM Standard Oil and Gas Lease Stipulations listed in the revised Appendix A, as opposed to the "standard stipulations" printed on Bureau oil and gas lease forms.

The Federal Land Policy and Management Act (FLPMA) in section 103 defines public lands as ". . . any land and interest in land owned by the United States. . ." The BLM has the authority to issue oil and gas leases with standard stipulations and special stipulations on the public lands. The federal mineral estate, according to FLPMA, is a part of the public lands.

The issuance of an oil and gas lease is a federal action that must comply with the National Environmental Policy Act (NEPA). In order to comply with NEPA, it is our policy and within our authority to require compliance with the stipulations on an oil and gas lease and the mitigations developed through the environmental analysis process, unless a valid reason exists for the modification or waiver of one or more of the stipulations. This is true for lands where both the surface and subsurface is in federal ownership and for split estate lands. In the past we have applied the "special stipulations" to oil and gas leases involving split estate, and we plan to continue doing so. The enforcement of those mitigations on split estate is contingent on the following three conditions: (1) on- and off-site effects to threatened and endangered species, (2) on- and off-site effects to cultural and historic values, and (3) off-site impacts to any resource values on proximate Federal lands. The need to enforce the stipulations would be determined through an environmental analysis of each specific development proposal (such as for an APD). Thus, the stipulations would be applied only when determined to be necessary after a case-by-case review. The stipulations must be applied to each lease, in order to reserve for the Bureau the right to modify operations on portions of a lease as part of our statutory requirements for environmental protection. It would be impossible at the time of leasing to predict where development would occur and if any of the three conditions described above would be in effect.



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Team Leader
Bureau of Land Management
Washakie Resource Area

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4 We are also disturbed by the lack of discussion of mitigation measures and lease conditions in Appendix J. Appendix J describes the environmental impacts which are common to all alternatives. The BLM has gone to great lengths to describe all the remotely possible impacts which could result from energy and mineral activities. However, we believe this section should include a discussion of the wide number of mitigation measures taken either to entirely avoid or significantly minimize any adverse impacts associated with oil and gas activities. It is the BLM's responsibility to identify these measures so as not to inflame concerned publics which have an interest in how the public lands are managed. The public needs to know the conditions under which surface disturbing activities are allowed to proceed. While we are aware that the draft RMP includes a discussion of lease stipulations and conditions in Appendix A, similar documentation should also be included in Appendix J.

We support the BLM's decision to recommend a nonwilderness designation for the Honeycombs, Cedar Mountain, Medicine Lodge and Alkali Creek Wilderness Study Areas. It is important that these areas remain open in order to afford exploration and development opportunities for energy resources.

However, we oppose the wilderness recommendation for the Trapper Creek Area due to its high potential for tar sands. The BLM has indicated in its discussion of the WSA that two potentially recoverable deposits of tar sands have been recognized within the WSA and nearly 30 other deposits are known to exist outside the WSA. In addition, the BLM has indicated that one company is "actively pursuing" feasibility studies of various extraction technologies relating to the development of one of these deposits. If Trapper Creek is designated wilderness by Congress, it would virtually preclude this extraction from occurring. We believe this area should not be recommended for wilderness; at minimum, we strongly recommend that the BLM modify the boundary of Trapper Creek to exclude these high potential areas.

We appreciate this opportunity to comment on the Draft EIS and RMP for the Washakie Resource Area. We encourage the BLM to fully consider the points we have addressed and to revise the final planning documents accordingly. Please contact me should you have any questions regarding our views.

Sincerely,

Alice Frell Benitez

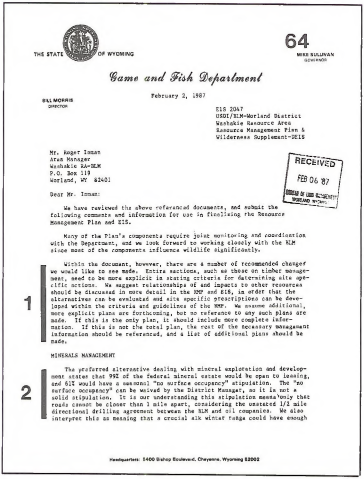
Alice Frell Benitez
Public Lands Director

AFB:cw

31-2 Two forms of stipulations were proposed in the Draft RMP/EIS for oil and gas leasing in the Preferred Alternative: a "no surface occupancy" (NSO) form and a seasonal or prohibitive form to protect wildlife habitat. As arrayed in the Draft, the NSO mitigation affected .04 percent of the high potential mineral estate and 12 percent of the moderate potential mineral estate. The portion of stipulation #2 that applies to sage grouse leks and elk calving areas affects 1 percent of the high potential mineral estate and 3 percent of the moderate potential mineral estate. As explained in the introduction to Chapter 2 of the Final EIS, the moderate potential areas have been changed to low potential. A trade-off analysis was done as part of the impact analysis. The analysis shows that these mitigations are not tying up substantial portions of the high potential mineral estate while affording some measure of protection to wildlife habitat. **All** lease stipulations are applied on a case-by-case basis, at the time a lease is issued. Language is included in the RMP/EIS which indicates certain restrictions may be modified or waived if not applicable and if supported by a site-specific analysis (refer to the revised Appendix A).

31-3 We believe that our analysis, including the discussion of the proposed Spanish Point Karst ACEC (Appendix G in the Draft RMP/EIS), provides the information required to support a "no lease" option for the proposed ACEC. (Refer also to response 12-2.) We provided for withdrawals from mineral entry **and** from oil and gas leasing in the Preferred Alternative and in Alternative D (pages 33 and 63 of the Draft RMP/EIS). As explained in the introduction to Chapter 2 of the Final EIS, it has been determined through legal review that it is inappropriate to pursue a withdrawal from mineral leasing since leasing is a discretionary action. Further, Section 103 of the FLPMA, which defines "withdrawal," does not include the action of mineral leasing. The proposed withdrawal from mineral entry would eventually be sent to Congress in conformance with Section 204 of the FLPMA.

31-4 Refer to response 11-5.



THE STATE OF WYOMING

64

MIKE SULLIVAN
GOVERNOR

Game and Fish Department

BILL MORRIS
DIRECTOR

February 2, 1987

EIS 2047
USDI/BLM-Worland District
Washakie Resource Area
Resource Management Plan &
Wilderness Supplement-DEIS

Mr. Roger Inman
Area Manager
Washakie RA-BLM
P.O. Box 119
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Dear Mr. Inman:

We have reviewed the above referenced documents, and submit the following comments and information for use in finalizing the Resource Management Plan and EIS.

Many of the Plan's components require joint monitoring and coordination with the Department, and we look forward to working closely with the BLM since most of the components influence wildlife significantly.

1 Within the document, however, there are a number of recommended changes we would like to see made. Entire sections, such as those on timber management, need to be more explicit in stating criteria for determining site specific actions. We suggest relationships of and impacts to other resources should be discussed in more detail in the RMP and EIS, in order that the alternatives can be evaluated and site specific prescriptions can be developed within the criteria and guidelines of the RMP. We assume additional, more explicit plans are forthcoming, but no reference to any such plans are made. If this is the only plan, it should include more complete information. If this is not the total plan, the rest of the necessary management information should be referenced, and a list of additional plans should be made.

MINERALS MANAGEMENT

2 The preferred alternative dealing with mineral exploration and development states that 99% of the federal mineral estate would be open to leasing, and 61% would have a seasonal "no surface occupancy" stipulation. The "no surface occupancy" can be waived by the District Manager, so it is not a solid stipulation. It is our understanding this stipulation means only that roads cannot be closer than 1 mile apart, considering the unstated 1/2 mile directional drilling agreement between the BLM and oil companies. We also interpret this as meaning that a crucial elk winter range could have enough

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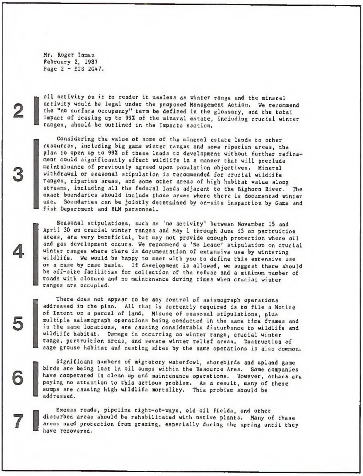

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2 oil activity on it to render it useless as winter range and the mineral activity would be legal under the proposed Management Action. We recommend the "no surface occupancy" term be defined in the glossary, and the total impact of leasing up to 99% of the mineral estate, including crucial winter ranges, should be outlined in the Impacts section.

3 Considering the value of some of the mineral estate lands to other resources, including big game winter ranges and some riparian areas, the plan to open up to 99% of these lands to development without further refinement could significantly affect wildlife in a manner that will preclude maintainance of previously agreed upon population objectives. Mineral withdrawal or seasonal stipulation is recommended for crucial wildlife ranges, riparian areas, and some other areas of high habitat value along streams, including all the federal lands adjacent to the Bighorn River. The exact boundaries should include those areas where there is documented winter use. Boundaries can be jointly determined by on-site inspection by Game and Fish Department and BLM personnel.

4 Seasonal stipulations, such as 'no activity' between November 15 and April 30 on crucial winter ranges and May 1 through June 15 on partruition areas, are very beneficial, but may not provide enough protection where oil and gas development occurs. We recommend a 'No Lease' stipulation on crucial winter ranges where there is documentation of extensive use by wintering wildlife. We would be happy to meet with you to define this extensive use on a case by case basis. If development is allowed, we suggest there should be off-site facilities for collection of the refuse and a minimum number of roads with closure and no maintenance during times when crucial winter ranges are occupied.

5 There does not appear to be any control of seismograph operations addressed in the plan. All that is currently required is to file a Notice of Intent on a parcel of land. Misuse of seasonal stipulations, plus multiple seismograph operations being conducted in the same time frames and in the same locations, are causing considerable disturbance to wildlife and wildlife habitat. Damage is occurring on winter range, crucial winter range, partruition areas, and severe winter relief areas. Destruction of sage grouse habitat and nesting sites by the same operations is also common.

6 Significant numbers of migratory waterfowl, shorebirds and upland game birds are being lost in oil sumps within the Resource Area. Some companies have cooperated in clean up and maintenance operations. However, others are paying no attention to this serious problem. As a result, many of these sumps are causing high wildlife mortality. This problem should be addressed.

7 Excess roads, pipeline right-of-ways, old oil fields, and other disturbed areas should be rehabilitated with native plants. Many of these areas need protection from grazing, especially during the spring until they have recovered.

Response to Letter 64

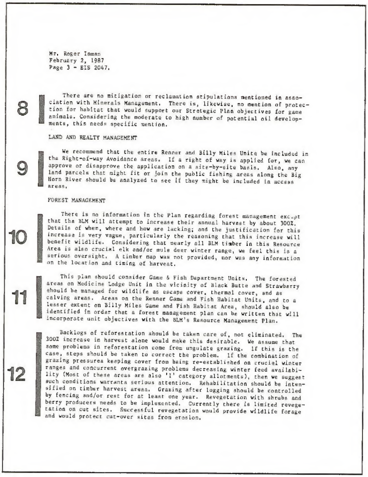
64-1 The purpose of the RMP/EIS, because of its summary nature, is to provide guidance for the next tier of the Bureau's planning process: the development of activity plans. Those plans (e.g., habitat management plans, allotment management plans, or forest management plans) will address site-specific prescriptions and actions. The impacts of those site-specific proposals are addressed in environmental assessments. Refer also to the discussion on page 1 of the Draft RMP/EIS.

64-2 A misunderstanding exists relative to the term "seasonal no surface occupancy." The revised Appendix A and modifications of the text should help clarify the situation and resolve that misunderstanding. The stipulations should be viewed as "seasonal restrictions" (stipulations 1, 2a, 2b, and 3), a "prohibitive restriction" (stipulation 2c), and a "no surface occupancy" (NSO) restriction (stipulation 4). Stipulation 4 may not be modified without a planning amendment. In the preferred alternative we have proposed 86,100 acres for "no surface occupancy" (stipulation 4), of which nearly 86,000 acres is in elk habitat. The analysis in this RMP/EIS is based on the premise that "no surface occupancy" is a blanket over the area to which it is applied. The interpretation of NSO in use several years ago, where strips of occupancy were possible to allow directional drilling, was not used.

Based on these and other comments, we have re-examined the impacts of "no leasing" on threatened and endangered species habitat, west slope canyons, elk calving areas, and selected crucial winter ranges (see Appendix M).

64-3 The Draft RMP/EIS does not proposed to "open" 99 percent of the planning area to oil and gas development. The area **is** "open" unless a decision is made to the contrary. The proposal is to "allow" the leasing of about 99 percent of the federal mineral estate. Many factors, including economics, geology, and restrictions applied by the BLM, dictate whether exploration of a lease ever occurs. Currently, with the vast majority of the resource area under lease, only 254 of about 1,500 leases (covering about 10 percent of the acreage leased) were producing oil and gas in February 1986. Refer to page 67 in the Draft RMP/EIS and to response 15-1.

64-4 The use of "no lease" restrictions to protect surface values is generally inappropriate, especially where the use of restrictions, such as the mitigations described in Appendixes A and F of this



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8 There are no mitigation or reclamation stipulations mentioned in association with Minerals Management. There is, likewise, no mention of protection for habitat that would support our Strategic Plan objectives for game animals. Considering the moderate to high number of potential oil developments, this needs specific mention.

LAND AND REALTY MANAGEMENT

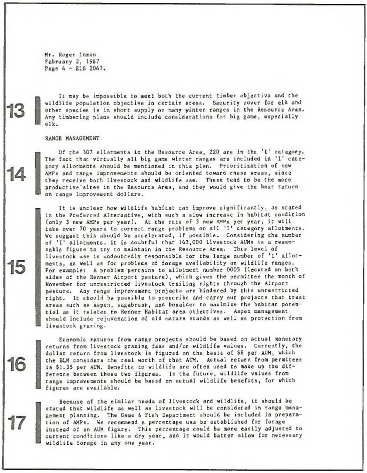
9 We recommend that the entire Renner and Billy Miles Units be included in the Right-of-way Avoidance areas. If a right of way is applied for, we can approve or disapprove the application on a site-by-site basis. Also, any land parcels that might fit or join the public fishing areas along the Big Horn River should be analyzed to see if they might be included in access areas.

FOREST MANAGEMENT

10 There is no information in the Plan regarding forest management except that the BLM will attempt to increase their annual harvest by about 300%. Details of when, where and how are lacking; and the justification for this increase is very vague, particularly the reasoning that this increase will benefit wildlife. Considering that nearly all BLM timber in this Resource Area is also crucial elk and/or mule deer winter range, we feel this is a serious oversight. A timber map was not provided, nor was any information on the location and timing of harvest.

11 This plan should consider Game & Fish Department Units. The forested areas on Medicine Lodge Unit in the vicinity of Black Butte and Strawberry should be managed for wildlife as escape cover, thermal cover, and as calving areas. Areas on the Renner Game and Fish Habitat Units, and to a lesser extent on Billy Miles Game and Fish Habitat Area, should also be identified in order that a forest management plan can be written that will incorporate unit objectives with the BLM's Resource Management Plan.

12 Backlogs of reforestation should be taken care of, not eliminated. The 300% increase in harvest alone would make this desirable. We assume that some problems in reforestation come from ungulate grazing. If this is the case, steps should be taken to correct the problem. If the combination of grazing pressures keeping cover from being re-established on crucial winter ranges and concurrent overgrazing problems decreasing winter feed availability (Most of these areas are also 'I' category allotments), then we suggest such conditions warrants serious attention. Rehabilitation should be intensified on timber harvest areas. Grazing after logging should be controlled by fencing and/or rest for at least one year. Revegetation with shrubs and berry producers needs to be implemented. Currently there is limited revegetation on cut sites. Successful revegetation would provide wildlife forage and would protect cut-over sites from erosion.



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13 It may be impossible to meet both the current timber objective and the wildlife population objective in certain areas. Security cover for elk and other species is in short supply on many winter ranges in the Resource Area. Any timbering plans should include considerations for big game, especially elk.

RANGE MANAGEMENT

14 Of the 307 allotments in the Resource Area, 220 are in the 'I' category. The fact that virtually all big game winter ranges are included in 'I' category allotments should be mentioned in this plan. Prioritization of new AMPs and range improvements should be oriented toward these areas, since they receive both livestock and wildlife use. These tend to be the more productive sites in the Resource Area, and they would give the best return on range improvement dollars.

15 It is unclear how wildlife habitat can improve significantly, as stated in the Preferred Alternative, with such a slow increase in habitat condition (only 3 new AMPs per year). At the rate of 3 new AMPs per year, it will take over 70 years to correct range problems on all 'I' category allotments. We suggest this should be accelerated, if possible. Considering the number of 'I' allotments, it is doubtful that 143,000 livestock AUMs is a reasonable figure to try to maintain in the Resource Area. This level of livestock use is undoubtedly responsible for the large number of 'I' allotments, as well as for problems of forage availability on wildlife ranges. For example: A problem pertains to allotment number 0005 (located on both sides of the Renner Airport pasture), which gives the permittee the month of November for unrestricted livestock trailing rights through the Airport pasture. Any range improvement projects are hindered by this unrestricted right. It should be possible to prescribe and carry out projects that treat areas such as aspen, sagebrush, and boxelder to maximize the habitat potential as it relates to Renner Habitat area objectives. Aspen management should include rejuvenation of old mature stands as well as protection from livestock grazing.

16 Economic returns from range projects should be based on actual monetary returns from livestock grazing fees and/or wildlife values. Currently, the dollar return from livestock is figured on the basis of $8 per AUM, which the BLM considers the real worth of that AUM. Actual return from permitees is $1.35 per AUM. Benefits to wildlife are often used to make up the difference between these two figures. In the future, wildlife values from range improvements should be based on actual wildlife benefits, for which figures are available.

17 Because of the similar needs of livestock and wildlife, it should be stated that wildlife as well as livestock will be considered in range management planning. The Game & Fish Department should be included in preparation of AMPs. We recommend a percentage use be established for forage instead of an AUM figure. This percentage could be more easily adjusted to current conditions like a dry year, and it would better allow for necessary wildlife forage in any one year.

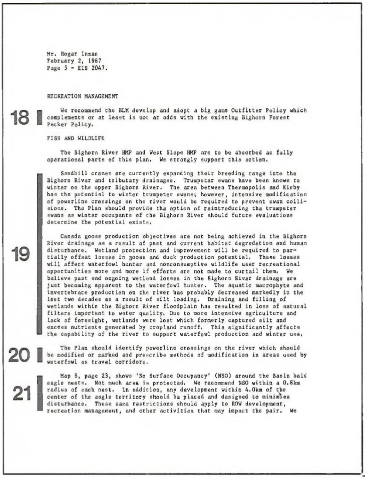
document and Appendixes H and I of the Draft RMP/EIS, and other appropriate requirements or restrictions, provide adequate protection. Specific mitigations would be identified during environmental analyses or proposals for development.

64-5 The restrictions to be applied to geophysical exploration are described in each of the alternatives (refer to page 24 of the Draft RMP/EIS for the Preferred Alternative). The BLM does not approve or disapprove authorizations for geophysical exploration. Geophysical operators are required, however, to agree to and conform with a set of practices to be followed. These practices contain the requirements appropriate for the activity proposed. In the case of non-compliance, the BLM can seek remedies for mitigation of impacts. If mitigations do not satisfactorily resolve a problem, other remedies, such as a cease and desist order, court order or revocation of a performance bond, can be pursued. Geophysical exploration is subject to the standard oil and gas leasing stipulations (revised Appendix A) and to any other applicable surface protection measures (e.g., ORV use restrictions and cultural resource inventories and clearances).

64-6 We are aware of the problem and intend to resolve it by working with industry to close and rehabilitate unneeded pits, to cover active pits with netting, or to use onsite tanks for the separation of oil and water and for the storage of waste oil. These actions are within existing authority and standard operating procedures, and can be accomplished without a planning decision or analysis in the RMP/EIS.

64-7 Rehabilitation of disturbed areas is standard operating procedure. The BLM's surface compliance specialists prescribe seeding mixtures when reviewing APD's, requests for ROW's, and other surface disturbing actions. Fencing may be required, where feasible, such as on reclaimed bentonite pits.

64-8 Mitigation and rehabilitation requirements, not including those provided in the revised Appendix A, are site-specific and are not determined in the RMP/EIS. Other mitigations of impacts for mineral development activities that are discretionary (those relating to leasable or salable minerals) are developed through environmental analyses of the specific proposals. Other mitigations of impacts from non-discretionary activities (those related to locatable minerals) are developed through established procedures between the operator and the State of Wyoming. Refer also to response 16-5.



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RECREATION MANAGEMENT

18 We recommend the BLM develop and adopt a big game Outfitter Policy which complements or at least is not at odds with the existing Bighorn Forest Pecker Policy.

FISH AND WILDLIFE

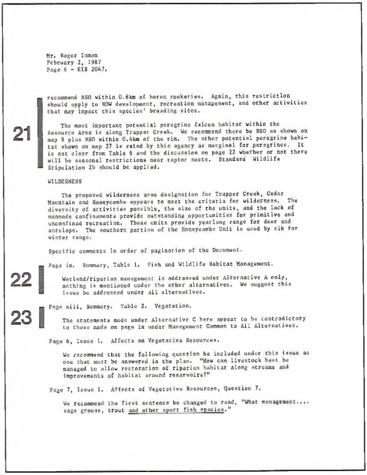
The Bighorn River HMP and West Slope HMP are to be absorbed as fully operational parts of this plan. We strongly support this action.

19 Sandhill cranes are currently expanding their breeding range into the Bighorn River and tributary drainages. Trumpeter swans have been known to winter on the upper Bighorn River. The area between Thermopolis and Kirby has the potential to winter trumpeter swans; however, intensive modification of powerline crossings on the river would be required to prevent swan collisions. The Plan should provide the option of reintroducing the trumpeter swans as winter occupants of the Bighorn River should future evaluations determine the potential exists.

Canada goose production objectives are not being achieved in the Bighorn River drainage as a result of past and current habitat degradation and human disturbance. Wetland protection and improvement will be required to partially offset losses in goose and duck production potential. These losses will affect waterfowl hunter and nonconsumptive wildlife user recreational opportunities more and more if efforts are not made to curtail them. We believe past and ongoing wetland losses in the Bighorn River drainage are just becoming apparent to the waterfowl hunter. The aquatic macrophyte and invertebrate production on the river has probably decreased markedly in the last two decades as a result of silt loading. Draining and filling of wetlands within the Bighorn River floodplain has resulted in loss of natural filters important to water quality. Due to more intensive agriculture and lack of foresight, wetlands were lost which formerly captured silt and excess nutrients generated by cropland runoff. This significantly affects the capability of the river to support waterfowl production and winter use.

20 The Plan should identify powerline crossings on the river which should be modified or marked and prescribe methods of modification in areas used by waterfowl as travel corridors.

21 Map 8, page 23, shows 'No Surface Occupancy' (NSO) around the Basin bald eagle nests. Not much area is protected. We recommend NSO within a 0.8km radius of each nest. In addition, any development within 4.0km of the center of the eagle territory should be placed and designed to minimize disturbance. These same restrictions should apply to ROW development, recreation management, and other activities that may impact the pair. We



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21 recommend NSO within 0.8km of heron rookeries. Again, this restriction should apply to ROW development, recreation management, and other activities that may impact this species' breeding sites.

The most important potential peregrine falcon habitat within the Resource Area is along Trapper Creek. We recommend there be NSO as shown on map 8 plus NSO within 0.4km of the rim. The other potential peregrine habitat shown on map 27 is rated by this agency as marginal for peregrines. It is not clear from Table 6 and the discussion on page 22 whether or not there will be seasonal restrictions near raptor nests. Standard Wildlife Stipulation 2b should be applied.

WILDERNESS

The proposed wilderness area designation for Trapper Creek, Cedar Mountain and Honeycombs appears to meet the criteria for wilderness. The diversity of activities possible, the size of the units, and the lack of manmade confinements provide outstanding opportunities for primitive and unconfined recreation. These units provide yearlong range for deer and antelope. The southern portion of the Honeycombs Unit is used by elk for winter range.

Specific comments in order of pagination of the Document.

22 Page ix. Summary, Table 1. Fish and Wildlife Habitat Management.

Wetland/riparian management is addressed under Alternative A only, nothing is mentioned under the other alternatives. We suggest this issue be addressed under all alternatives.

23 Page xiii, Summary. Table 2. Vegetation.

The statements made under Alternative C here appear to be contradictory to those made on page ix under Management Common to All Alternatives.

Page 6, Issue 1. Affects on Vegetative Resources.

We recommend that the following question be included under this issue as one that must be answered in the plan. "How can livestock best be managed to allow restoration of riparian habitat along streams and improvements of habitat around reservoirs?"

Page 7, Issue 1. Affects of Vegetative Resources, Question 7.

We recommend the first sentence be changed to read, "What management.... sage grouse, trout and other sport fish species."

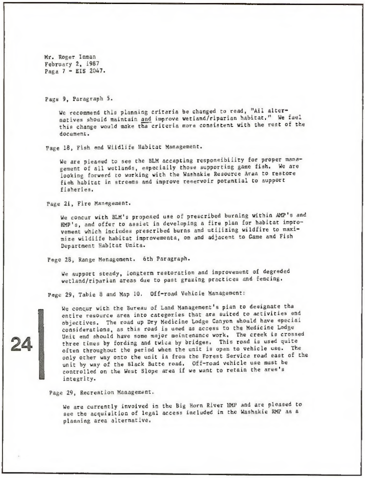
64-9 We have revised the narrative on avoidance areas in the Preferred Alternative and other alternatives to include these habitat units. Game and Fish Department input into the decision to approve or disapprove rights-of-way applications on public lands in habitat management units is assured. Access to Bighorn River tracts is discussed in the recreation management section in the Preferred Alternative (page 29 of the Draft RMP/EIS).

64-10 The specific details of timber harvesting, including the location and timing of sales, will be discussed in the forest management plan for the planning area. The actions proposed in that plan will be analyzed and documented in an environmental assessment. The prescription for timber harvesting in the Preferred Alternative (page 27) states that harvests would be designed to accommodate a number of resource values, including habitat and forage for wildlife. It also sets an upper limit on harvest volume, but does not mandate a specific volume. Additionally, under Management Common to All Alternatives, we state that timber harvesting would be conducted to benefit wildlife and other resource values (page 16). We also have attempted to clarify concerns regarding timber harvesting by revising the Preferred Alternative to reflect management objectives of affected programs. The forest resource is described in Chapter 3 (pages 79 and 80), and woodlands and commercial (coniferous) forest are shown on Map 25. A text revision has also been made to clarify terminology, such as "forest base."

64-11 These items are activity plan considerations which will be addressed in the forest management plan for the planning area. The Game and Fish Department will be asked to provide input into the development of the plan.

64-12 There may be some misunderstanding of the phrase "elimination of backlogs." A reforestation backlog occurs when a harvested area is not adequately restocked with natural revegetation after five years. We proposed, under Management Common to All Alternatives (page 16 of the Draft RMP/EIS), to eliminate backlogs by reseeding or planting all unstocked forest land within 10 years. Again, the suggestions made in the comment are appropriate considerations for the forest management plan rather than for the RMP/EIS.

64-13 The RMP/EIS provides the basic guidance to assure consideration of big game in the forest management plan. The specifics of big game needs will be addressed in the forest management plan. However, estab-



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Page 9, Paragraph 5.

We recommend this planning criteria be changed to read, "All alternatives should maintain and improve wetland/riparian habitat." We feel this change would make the criteria more consistent with the rest of the document.

Page 18, Fish and Wildlife Habitat Management.

We are pleased to see the BLM accepting responsibility for proper management of all wetlands, especially those supporting game fish. We are looking forward to working with the Washakie Resource Area to restore fish habitat in streams and improve reservoir potential to support fisheries.

Page 21, Fire Management.

We concur with BLM's proposed use of prescribed burning within AMP's and HMP's, and offer to assist in developing a fire plan for habitat improvement which includes prescribed burns and utilizing wildfire to maximize wildlife habitat improvements, on and adjacent to Game and Fish Department Habitat Units.

Page 28, Range Management. 6th Paragraph.

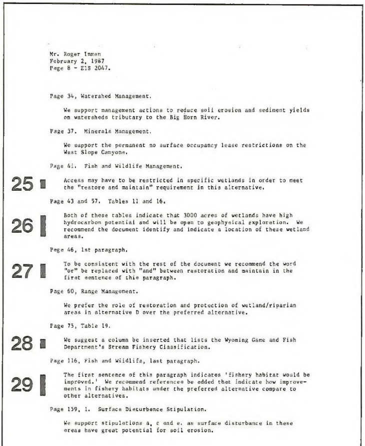
We support steady, longterm restoration and improvement of degraded wetland/riparian areas due to past grazing practices and fencing.

Page 29, Table 8 and Map 10. Off-road Vehicle Management:

24 We concur with the Bureau of Land Management's plan to designate the entire resource area into categories that are suited to activities and objectives. The road up Dry Medicine Lodge Canyon should have special considerations, as this road is used as access to the Medicine Lodge Unit and should have some major maintenance work. The creek is crossed three times by fording and twice by bridges. This road is used quite often throughout the period when the unit is open to vehicle use. The only other way onto the unit is from the Forest Service road east of the unit by way of the Black Butte road. Off-road vehicle use must be controlled on the West Slope area if we want to retain the area's integrity.

Page 29, Recreation Management.

We are currently involved in the Big Horn River HMP and are pleased to see the acquisition of legal access included in the Washakie RMP as a planning area alternative.



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Page 34, Watershed Management.

We support management actions to reduce soil erosion and sediment yields on watersheds tributary to the Big Horn River.

Page 37. Minerals Management.

We support the permanent no surface occupancy lease restrictions on the West Slope Canyons.

Page 41. Fish and Wildlife Management.

25 Access may have to be restricted in specific wetlands in order to meet the "restore and maintain" requirement in this alternative.

Page 43 and 57. Tables 11 and 16.

26 Both of these tables indicate that 3000 acres of wetlands have high hydrocarbon potential and will be open to geophysical exploration. We recommend the document identify and indicate a location of these wetland areas.

Page 46, 1st paragraph.

27 To be consistent with the rest of the document we recommend the word "or" be replaced with "and" between restoration and maintain in the first sentence of this paragraph.

Page 60, Range Management.

We prefer the role of restoration and protection of wetland/riparian areas in alternative D over the preferred alternative.

Page 75, Table 19.

28 We suggest a column be inserted that lists the Wyoming Game and Fish Department's Stream Fishery Classification.

Page 116, Fish and Wildlife, last paragraph.

29 The first sentence of this paragraph indicates 'fishery habitat would be improved.' We recommend references be added that indicate how improvements in fishery habitats under the preferred alternative compare to other alternatives.

Page 159, 1. Surface Disturbance Stipulation.

We support stipulations a, c and e. as surface disturbance in these areas have great potential for soil erosion.

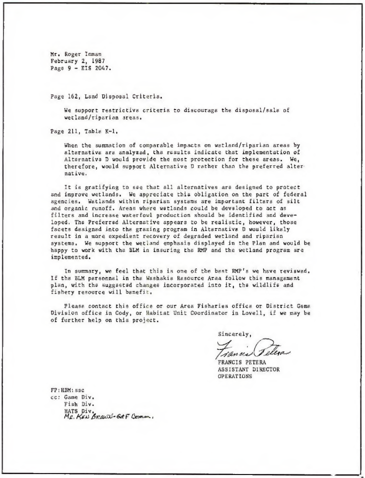
lishing wildlife population goals without providing for the treatments necessary to assure adequate habitat may mean that some wildlife goals may not be attained.

64-14 The categorization of allotments is a system of establishing priorities for the concentration of the workforce and funding (refer to Appendix C, Allotment Categorization Criteria). With the correct establishment of priorities, the allotments of greatest concern would be addressed first. On many allotments, conflicts with wildlife are among the most serious problems, and the prioritization should reflect those conflicts. Other actions will be employed, in addition to the development of new AMPs, to help improve wildlife habitat. These are described in the Preferred Alternative.

64-15 The 143,000 AUMS of livestock use reflects grazing preference; actual use has been about 122,000 AUMS. This point has been clarified in the descriptions of the alternatives. With this in mind, it should be realized that some allotments may have additional livestock forage available over the long-term, and that some allotments are not producing, or capable of producing, the amount of livestock forage currently authorized. Adjustments in livestock grazing use are expected to balance use at not more than 143,000 AUMs, even with substantial improvement in current ecological range condition.

64-16 In benefit/cost analyses, we use "values" to determine benefits, not the monetary return to the BLM. The benefit/cost analyses attempt to quantify expected benefits and costs for all activities affected by a project or a plan. The AUM values used in benefit/cost analyses are compiled and updated by our State Office and are used by the BLM throughout Wyoming. The current AUM values are $6.84 for cattle and $4.75 for sheep. Wildlife values, such as the value of hunter or fisherman days, are also included in the benefit/cost analysis. So, both livestock and wildlife AUM values are considered in benefit/cost analyses.

64-17 The Game and Fish Department will be asked to provide input into the development of **all** activity plans, including allotment management plans. Appendix E, on page 183 of the Draft RMP/EIS, recommends that the use of key species in allotments should be a maximum of 50 percent utilization of the current year's production. As a point of clarification, 50 percent is the combined utilization by livestock and wildlife.



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Page 162, Land Disposal Criteria.

We support restrictive criteria to discourage the disposal/sale of wetland/riparian areas.

Page 211, Table K-1.

When the summation of comparable impacts on wetland/riparian areas by alternative are analyzed, the results indicate that implementation of Alternative D would provide the most protection for these areas. We, therefore, would support Alternative D rather than the preferred alternative.

It is gratifying to see that all alternatives are designed to protect and improve wetlands. We appreciate this obligation on the part of federal agencies. Wetlands within riparian systems are important filters of silt and organic runoff. Areas where wetlands could be developed to act as filters and increase waterfowl production should be identified and developed. The Preferred Alternative appears to be realistic, however, those facets designed into the grazing program in Alternative D would likely result in a more expedient recovery of degraded wetland and riparian systems. We support the wetland emphasis displayed in the Plan and would be happy to work with the BLM in insuring the RMP and the wetland program are implemented.

In summary, we feel that this is one of the best RMP's we have reviewed. If the BLM personnel in the Washakie Resource Area follow this management plan, with the suggested changes incorporated into it, the wildlife and fishery resource will benefit.

Please contact this office or our Area Fisheries office or District Game Division office in Cody, or Habitat Unit Coordinator in Lovell, if we may be of further help on this project.

Sincerely,

Francis Petera
FRANCIS PETERA
ASSISTANT DIRECTOR
OPERATIONS

FP:HBM:ssc
cc: Game Div.
Fish Div.
HATS Div.
Mr. Ken Brown-G&F Comm.

64-18 The activity plans developed for special recreation management areas and extensive recreation management areas will address policies for outfitters and guides.

64-19 Needed modifications of powerlines on public lands will be coordinated with power companies and the Game and Fish Department.

64-20 Terms, conditions and mitigations for land use authorizations in corridors, and elsewhere, are routinely prescribed, including specifications for powerline configurations. For those existing projects that require marking or modification, we can only work on a cooperative basis with the right-of-way holder and the Game and Fish Department to accomplish changes. Identification of powerline crossings needing modification should occur during the development of habitat management plans.

64-21 These concerns are addressed in the re-analysis of alternatives C and D. Reworking that analysis is a result of the need for compliance with the T&E Species Act and national recovery plans.

Stipulation 2 in revised Appendix A provides for the protection of raptor habitat through the use of seasonal or prohibitional surface disturbance restrictions, which are applied in appropriate situations. Table 6 (and related tables) have been modified to clarify this point.

64-22 Wetland/riparian management is addressed in each of the alternatives analyzed in detail. Prescriptions for wetland/riparian management are not necessarily listed under a "wetland/riparian" or "wildlife" heading, but are found in each alternative, nevertheless. Refer to responses 18-1 and 26-1 (Issue #1, Question #9).

64-23 In the summary of management actions on page ix, we state that wetlands would be managed to maintain and improve habitat. The summary of impacts for Alternative C, on page xiii indicates that wetland impacts would occur in allotments occupied by wild horses. Thus, in 4 of the 307 allotments, the horses would negatively affect wetlands if Alternative C was chosen as the preferred management. The two are not contradictory since the management of wetlands is discussed in general terms for the entire resource area, and the impacts from horses are confined to a small, specific area.

64-24 According to the Preferred Alternative (Table 8), roads in the Medicine Lodge Unit, including the road in the lower end of Dry Medicine Lodge Canyon (and the portion known as the "dugway") would be designated as "limited to time or season of use" for ORV use. This will allow the BLM to cooperate with the Game and Fish Department to limit use to specific periods during the year. The road through the canyon from the dugway to the National Forest Boundary would be closed.

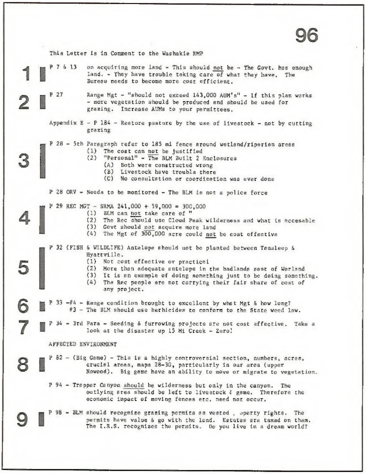
64-25 Control of access in wetlands is provided for in Alternative A through actions contained in habitat management plans, which are referenced on pages 18 and 41 of the Draft RMP/EIS.

64-26 The location of wetlands in high hydrocarbon potential areas can be determined by comparing Map 26 with Maps 8, 14, 16-1 or 17.

64-27 The suggested correction has been made.

64-28 Table 19 has been modified to include the Stream Fishery Classification.

64-29 A comparative statement has been added to the discussion of fishery habitats.



96

This Letter is in Comment to the Washakie RMP

1 P 7 & 13 on acquiring more land - This should not be - The Govt. has enough land. - They have trouble taking care of what they have. The Bureau needs to become more cost efficient.

2 P 27 Range Mgt - "should not exceed 143,000 AUM's" - If this plan works - more vegetation should be produced and should be used for grazing. Increase AUMs to your permittees.

Appendix E - P 184 - Restore pasture by the use of livestock - not by cutting grazing

3 P 28 - 5th Paragraph refer to 185 mi fence around wetland/riparian areas
(1) The cost can not be justified
(2) "Personal" - The BLM Built 2 Enclosures
(A) Both were constructed wrong
(B) Livestock have trouble there
(C) No consultation or coordination was ever done

P 28 ORV - Needs to be monitored - The BLM is not a police force

4 P 29 REC MGT - SRMA 241,000 + 59,000 = 300,000
(1) BLM can not take care of "
(2) The Rec should use Cloud Peak wilderness and what is accesable
(3) Govt should not acquire more land
(4) The Mgt of 300,000 acre could not be cost effective

5 P 32 (FISH & WILDLIFE) Antelope should not be planted between Tensleep & Hyattville.
(1) Not cost effective or practical
(2) More than adequate antelope in the badlands east of Worland
(3) It is an example of doing something just to be doing something.
(4) The Rec people are not carrying their fair share of cost of any project.

6 P 33 -#4 - Range condition brought to excellent by what Mgt & how long?
#3 - The BLM should use herbicides to conform to the State weed law.

7 P 34 - 3rd Para - Seeding & furrowing projects are not cost effective. Take a look at the disaster up 15 Mi Creek - Zero!

AFFECTED ENVIRONMENT

8 P 82 - (Big Game) - This is a highly controversial section, numbers, acres, crucial areas, maps 28-30, particularly in our area (upper Nowood). Big game have an ability to move or migrate to vegetation.

P 94 - Trapper Canyon should be wilderness but only in the canyon. The outlying area should be left to livestock & game. Therefore the economic impact of moving fences etc. need not occur.

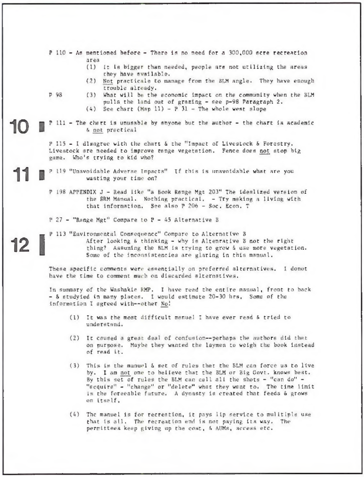
9 P 98 - BLM should recognize grazing permits as vested property rights. The permits have value & go with the land. Estates are taxed on them. The I.R.S. recognizes the permits. Do you live in a dream world?

Response to Letter 96

96-1 Since land would be acquired through equal value exchanges to accomplish management goals, public land would be transferred to private or other ownership. The effect of such action is that the BLM would acquire land which would be more suitable for BLM management. The result could very likely be a reduction in total acres managed by the BLM, although an increase in acres could occur in some cases.

96-2 Refer to response 64-15.

96-3 In some cases, we must resort to fencing in order to comply with the law to manage, protect and enhance these areas. While livestock grazing is a major cause of wetland/riparian habitat degradation, we propose only to fence wetland/riparian areas that cannot be maintained and improved through implementation of new grazing treatments. If these treatments do not halt degradation, fencing will be used to restore or improve habitat conditions of wetland/riparian areas. We will extend our full cooperation to any permittee or lessee who wants to reduce grazing pressure to allow establishment, maintenance, and improvement of wetland/riparian habitats.



P 110 - As mentioned before - There is no need for a 300,000 acre recreation area

(1) It is bigger than needed, people are not utilizing the areas they have available.

(2) Not practicale to manage from the BLM angle. They have enough trouble already.

P 98 (3) What will be the economic impact on the community when the BLM pulls the land out of grazing - see p-98 Paragraph 2.

(4) See chart (Map 11) - P 31 - The whole west slope

10 P 111 - The chart is unusable by anyone but the author - the chart is academic & not practical

P 115 - I disagree with the chart & the "Impact of Livestock & Forestry. Livestock are needed to improve range vegetation. Fence does not stop big game. Who's trying to kid who?

11 P 119 "Unavoidable Adverse Impacts" If this is unavoidable what are you wasting your time on?

P 198 APPENDIX J - Read like "a Book Range Mgt 203" The idealized version of the SRM Manual. Nothing practical. - Try making a living with that information. See also P 206 - Soc. Econ. T

P 27 - "Range Mgt" Compare to P - 45 Alternative B

12 P 113 "Environmental Consequence" Compare to Alternative B
After looking & thinking - why is Altenrative B not the right thing? Assuming the BLM is trying to grow & use more vegetation. Some of the inconsistencies are glaring in this manual.

These specific comments were essentially on preferred alternatives. I donot have the time to comment much on discarded alternatives.

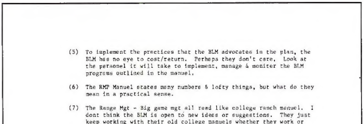
In summary of the Washakie RMP. I have read the entire manual, front to back - & studyied in many places. I would estimate 20-30 hrs. Some of the information I agreed with--other No!

(1) It was the most difficult manuel I have ever read & tried to understand.

(2) It caused a great deal of confusion--perhaps the authors did that on purpose. Maybe they wanted the laymen to weigh the book instead of read it.

(3) This is the manuel & set of rules that the BLM can force us to live by. I am not one to believe that the BLM or Big Govt. knows best. By this set of rules the BLM can call all the shots - "can do" - "acquire" - "change" or "delete" what they want to. The time limit is the foreseable future. A dynasty is created that feeds & grows on itself.

(4) The manuel is for recreation, it pays lip service to mulitiple use that is all. The recreation end is not paying its way. The permittees keep giving up the cost, & AUMs, access etc.



(5) To implement the practices that the BLM advocates in the plan, the BLM has no eye to cost/return. Perhaps they don't care. Look at the personel it will take to implement, manage & moniter the BLM programs outlined in the manuel.

(6) The RMP Manuel states many numbers & lofty things, but what do they mean in a practical sense.

(7) The Range Mgt - Big game mgt all read like college ranch manuel. I dont think the BLM is open to new ideas or suggestions. They just keep working with their old college manuels whether they work or not. For a new idea, some people have gone to look at holistic resource mgt.

(8) There are many controversal issues covered in the manuel. Considering the limited space & time, it is impossible for me to go into them. I keep returning to what is practical; what can we live with. The world is not made up just for games.

(9) There are many inconsistencies in the manuel - therefore confusion.

(10) As I read the Washakie RMP Manuel, I tried to think what the authors were trying to say to people in agriculture, forestry, mining or oil business. Since I am in agriculture, what were the authors saying to me? The message that comes through is that the livestock business is a thorn in the side of the BLM. The BLM wishes we were all gone. We have served our purpose. Now the BLM could turn all of the Big Horn Mts. into a recreation area. Everyone could play all the time. Note the special Rec Mgt area P 31 - Map # 11. It covers all of the west slope up to the Cloud Peak wilderness. Do you realize the economic impact of such a decision?

Through this manuel & past experience, you have shown me what you are going to do. Right or wrong. The authors of the RMP & experience are teaching me not to trust or believe what the BLM puts out as true. I do not believe Big Brother knows best. As Abe Lincoln phrased it, "avoid the abuse of power, have faith that right makes might but not the other way around. The BLM is in the process of turning it around.

These are my thoughts on the RMP.

/s/Rob Orchard

We recognize that the fences associated with the Cyprus Well and Seaman Jack Reservoir had design problems. We will coordinate future wetland/riparian improvement projects more closely with affected permittees and lessees.

96-4 Refer to response 132-7.

96-5 Antelope (and other wildlife species) transplants or reintroductions are the responsibility of the Wyoming Game and Fish Department. We propose to manage certain areas to facilitate and assist the Department's management goals.

96-6 The sections referenced in the letter have been modified to clarify our intentions; refer to the revised text.

96-7 The text regarding furrowing or seeding has been modified; refer to the revised text. The objectives of furrowing and seeding may be vegetation reestablishment or surface water management and erosion control, or both, not just forage production. The effectiveness of seeding and furrowing projects depends on site conditions, the degree of plant deterioration and the manner of project implementation. There are failures and successes, depending on these factors and the original objectives of the projects.

Lasting plant communities can be reestablished on slopes of less than 6 percent, with soils of moderate texture and chemistry that are naturally productive, through the use of appropriate seed types. Sometimes, furrowing alone is sufficient if adequate seed sources are available. In most cases, the developing vegetation requires protection from grazing until it is permanently established. Furrowing and seeding projects can achieve their objectives, and cost sharing methods of implementation can be used that will justify their use for vegetation enhancement and soil protection.

96-8 Vegetation is one of the stimuli that animals react to, because it provides shelter and forage needed for survival. The distribution of animals changes in response to those kinds of habitat conditions. Our responsibility is to ensure that ample vegetation exists for the survival of the animals.

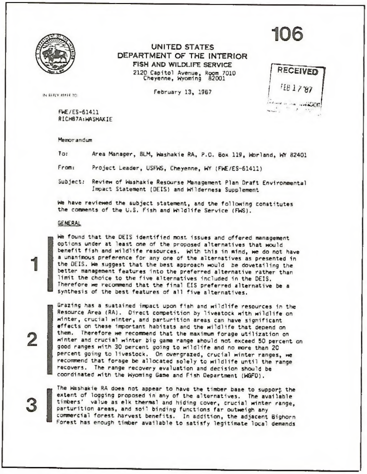
96-9 The Taylor grazing Act of June 28, 1934 states in part that "... the issuance of a permit pursuant to this Act shall not create any right, title, or estate in or to the lands."

96-10 Table 26 (page 111 of the Draft RMP/EIS) is one of three tables to be used in comparing the impacts of soil loss. The table has been modified to reflect tons of soil lost rather than percentages of soil loss.

96-10 Table 26 (page 111 of the Draft RMP/EIS) is one of three tables to be used in comparing the impacts of soil loss. The table has been modified to reflect tons of soil lost rather than percentages of soil loss.

96-11 Unavoidable adverse impacts should be compared among the alternatives as a measure of the negative effects of the alternatives. This comparison is a requirement of the National Environmental Policy Act.

96-12 The selection of Alternative B as the preferred management for the resource area might be appropriate if livestock grazing was the only use of the public lands. However, the preferred management attempts to balance all uses of the public lands to accomplish the mandates of the laws authorizing the uses of the public lands, including multiple use and sustained yield. In an attempt to achieve a balance, there may be trade-offs among uses.



106

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
2120 Capitol Avenue, Room 7010
Cheyenne, Wyoming 82001

RECEIVED
FEB 17 '87

February 13, 1987

IN REPLY REFER TO:

FWE/ES-61411
RICH87A:WASHAKIE

Memorandum

To: Area Manager, BLM, Washakie RA, P.O. Box 119, Worland, WY 82401

From: Project Leader, USFWS, Cheyenne, WY (FWE/ES-61411)

Subject: Review of Washakie Resourse Management Plan Draft Environmental Impact Statement (DEIS) and Wildernesa Supplement

We have reviewed the subject statement, and the following conatitutes the comments of the U.S. Fish and Wildlife Service (FWS).

GENERAL

1 We found that the DEIS identified most issues and offered management options under at least one of the proposed alternatives that would benefit fish and wildlife resources. With this in mind, we do not have a unanimous preference for any one of the alternatives as presented in the DEIS. We suggest that the best approach would be dovetailing the better management features into the preferred alternative rather than limit the choice to the five alternatives included in the DEIS. Therefore we recommend that the final EIS preferred alternative be a synthesis of the best features of all five alternatives.

2 Grazing has a suatained impact upon fish and wildlife resources in the Resource Area (RA). Direct competition by liveatock with wildlife on winter, crucial winter, and parturition areas can have significant effects on these important habitats and the wildlife that depend on them. Therefore we recommend that the maximum forage utilization on winter and crucial winter big game range ahould not exceed 50 percent on good ranges with 30 percent going to wildlife and no more than 20 percent going to livestock. On overgrazed, crucial winter ranges, we recommend that forage be allocated solely to wildlife until the range recovers. The range recovery evaluation and decision should be coordinated with the Wyoming Game and Fish Department (WGFD).

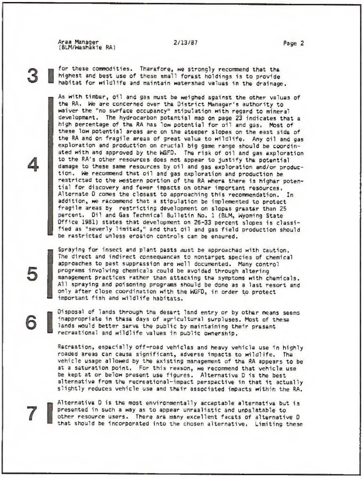
3 The Washakie RA doea not appear to have the timber base to support the extent of logging proposed in any of the alternatives. The available timbers' value as elk thermal and hiding cover, crucial winter range, parturition areas, and soil binding functions far outweigh any commercial forest harvest benefits. In addition, the adjacent Bighorn Forest has enough timber available to satisfy legitimate local demands

Response to Letter 106

106-1 The Preferred Alternative in the Draft RMP/EIS is a combination of the best features of the other four alternatives, as we see them. Thus, it follows that the final RMP/EIS will be a synthesis of those alternatives and the changes made to the alternatives resulting from the comments of the public and the planning team.

106-2 Forage use levels that would be allowed are discussed in Appendix E (normally a maximum of 50 percent of the current year's growth, by livestock and wildlife). Any adjustments to current livestock use of forage would be implemented based on monitoring. Refer also to responses 6-1 and 64-17.

106-3 We agree that one of the most important uses of forests in the planning area is as habitat for wildlife. The objectives of harvesting timber under the Preferred Alternative are tied to enhancing the management of many uses, including improving habitat for wildlife and accomplishing appropriate soil, water and forest management goals.



Area Manager
(BLM/Washakie RA)
2/13/87
Page 2

3 for these commodities. Therefore, we strongly recommend that the highest and best use of these small forest holdings is to provide habitat for wildlife and maintain watershed values in the drainage.

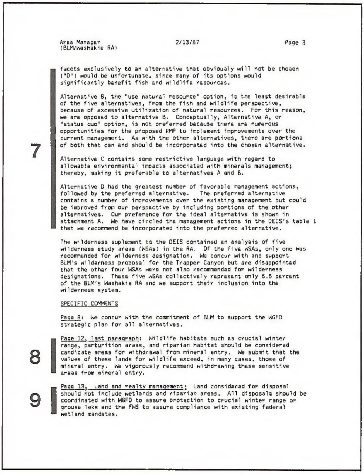
4 As with timber, oil and gas must be weighed against the other values of the RA. We are concerned over the District Manager's authority to waiver the "no surface occupancy" stipulation with regard to mineral development. The hydrocarbon potential map on page 23 indicates that a high percentage of the RA has low potential for oil and gas. Most of these low potential areas are on the steeper slopes on the east side of the RA and on fragile areas of great value to wildlife. Any oil and gas exploration and production on crucial big game range should be coordinated with and approved by the WGFD. The risk of oil and gas exploration to the RA's other resources does not appear to justify the potential damage to these same resources by oil and gas exploration and/or production. We recommend that oil and gas exploration and production be restricted to the western portion of the RA where there is higher potential for discovery and fewer impacts on other important resources. Alternate D comes the closest to approaching this recommendation. In addition, we recommend that a stipulation be implemented to protect fragile areas by restricting development on slopes greater than 25 percent. Oil and Gas Technical Bulletin No. 1 (BLM, Wyoming State Office 1981) states that development on 26-33 percent slopes is classified as "severly limited," and that oil and gas field production should be restricted unless erosion controls can be ensured.

5 Spraying for insect and plant pests must be approached with caution. The direct and indirect consequences to nontarget species of chemical approaches to pest suppression are well documented. Many control programs involving chemicals could be avoided through altering management practices rather than attacking the symptoms with chemicals. All spraying and poisoning programs should be done as a last resort and only after close coordination with the WGFD, in order to protect important fish and wildlife habitats.

6 Disposal of lands through the desert land entry or by other means seems inappropriate in these days of agricultural surpluses. Most of these lands would better serve the public by maintaining their present recreational and wildlife values in public ownership.

Recreation, especially off-road vehicles and heavy vehicle use in highly roaded areas can cause significant, adverse impacts to wildlife. The vehicle usage allowed by the existing management of the RA appears to be at a saturation point. For this reason, we recommend that vehicle use be kept at or below present use figures. Alternative D is the best alternative from the recreational-impact perspective in that it actually slightly reduces vehicle use and their associated impacts within the RA.

7 Alternative D is the most environmentally acceptable alternative but is presented in such a way as to appear unrealistic and unpalatable to other resource users. There are many excellent facets of alternative D that should be incorporated into the chosen alternative. Limiting these



Area Manager
(BLM/Washakie RA)
2/13/87
Page 3

facets exclusively to an alternative that obviously will not be chosen ("D") would be unfortunate, since many of its options would significantly benefit fish and wildlife resources.

Alternative B, the "use natural resource" option, is the least desirable of the five alternatives, from the fish and wildlife perspective, because of excessive utilization of natural resources. For this reason, we are opposed to alternative B. Conceptually, Alternative A, or "status quo" option, is not preferred because there are numerous opportunities for the proposed RMP to implement improvements over the current management. As with the other alternatives, there are portions of both that can and should be incorporated into the chosen alternative.

7 Alternative C contains some restrictive language with regard to allowable environmental impacts associated with minerals management; thereby, making it preferable to alternatives A and B.

Alternative D had the greatest number of favorable management actions, followed by the preferred alternative. The preferred alternative contains a number of improvements over the existing management but could be improved from our perspective by including portions of the other alternatives. Our preference for the ideal alternative is shown in attachment A. We have circled the management actions in the DEIS's table 1 that we recommend be incorporated into the preferred alternative.

The wilderness suplement to the DEIS contained an analysis of five wilderness study areas (WSAs) in the RA. Of the five WSAs, only one was recommended for wilderness designation. We concur with and support BLM's wilderness proposal for the Trapper Canyon but are disappointed that the other four WSAs were not also recommended for wilderness designations. These five WSAs collectively represent only 5.5 percent of the BLM's Washakie RA and we support their inclusion into the wilderness system.

SPECIFIC COMMENTS

Page 8: We concur with the commitment of BLM to support the WGFD strategic plan for all alternatives.

8 Page 12, last paragraph: Wildlife habitats such as crucial winter range, parturition areas, and riparian habitat should be considered candidate areas for withdrawal from mineral entry. We submit that the values of these lands for wildlife exceed, in many cases, those of mineral entry. We vigorously recommend withdrawing these sensitive areas from mineral entry.

9 Page 13, Land and realty management: Land considered for disposal should not include wetlands and riparian areas. All disposals should be coordinated with WGFD to assure protection to crucial winter range or grouse leks and the FWS to assure compliance with existing federal wetland mandates.

106-4 Due to the way we have applied the "no surface occupancy" restriction, it may be waived or modified only through a plan amendment (see responses 31-2 and 64-2). This "no surface occupancy" stipulation has been analyzed in the alternatives as a method for reducing or eliminating impacts to certain important wildlife habitats. Refer to the revised text and the revised Appendix A in this document.

The estimates of hydrocarbon potential were intended as a tool for use in comparison of impacts to mineral development and because of mineral development. It is not appropriate to use these estimates as the basis for making use allocations.

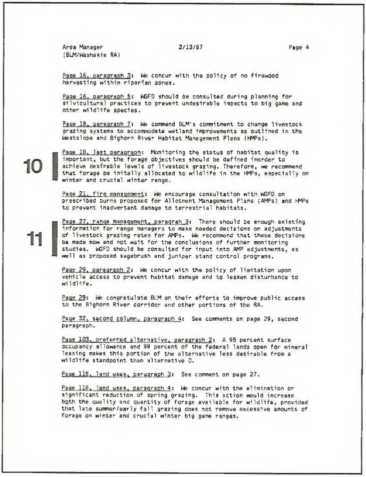
A 25 percent slope restriction is included in stipulation #1 (Appendix A) and is applied to every oil and gas lease issued.

106-5 All requests for spraying are carefully analyzed in environmental assessments (EAs) to determine any impacts that may result from the spraying. It is standard practice to consult the Wyoming Game and Fish Department during the preparation of the EAs. See also response 11-1.

106-6 The BLM is currently operating according to directives that address the disposal of lands through desert land entry. Considering the goals of the Conservation Reserve Program, authorized by the Food Security Act of 1985, the public interest would not be served by allowing desert land entry for land of the capability classes that the Department of Agriculture is seeking and paying to retire. Neither can it be considered in the public interest to authorize agricultural use where the entryman will raise government price-supported crops. A number of criteria are listed in Appendix B, which also would be applied when considering desert land entry applications. Of course, each proposal would be considered on its own merits.

106-7 Each alternative considered could be chosen in its entirety as the preferred management for the resource area. As is pointed out in the comment, the choice of Alternative D in its entirety, would be unpalatable to some resource users (as probably would the choice of any alternative in its entirety). A substantial portion of the prescriptions proposed in Alternative D were chosen for the Preferred Alternative, including those for fish and wildlife and soil and water management.

106-8 Based on comments received, we have done further analysis of the impacts of withdrawing certain important wildlife habitats from mineral entry. The results of that



Area Manager 2/13/87 Page 4
(BLM/Washakie RA)

Page 16, paragraph 3: We concur with the policy of no firewood harvesting within riparian zones.

Page 16, paragraph 5: WGFD should be consulted during planning for silvicultural practices to prevent undesirable impacts to big game and other wildlife species.

Page 18, paragraph 7: We commend BLM's commitment to change livestock grazing systems to accommodate wetland improvements as outlined in the Westslope and Bighorn River Habitat Management Plans (HMPs).

10 Page 18, last paragraph: Monitoring the status of habitat quality is important, but the forage objectives should be defined inorder to achieve desirable levels of livestock grazing. Therefore, we recommend that forage be initally allocated to wildlife in the HMPs, especially on winter and crucial winter range.

Page 21, fire management: We encourage consultation with WGFD on prescribed burns proposed for Allotment Management Plans (AMPs) and HMPs to prevent inadvertant damage to terrestrial habitats.

11 Page 27, range management, paragrah 3: There should be enough existing information for range managers to make needed decisions on adjustments of livestock grazing rates for AMPs. We recommend that these decisions be made now and not wait for the conclusions of further monitoring studies. WGFD should be consulted for input into AMP adjustments, as well as proposed sagebrush and juniper stand control programs.

Page 29, paragraph 2: We concur with the policy of limitation upon vehicle access to prevent habitat damage and to lessen disturbance to wildlife.

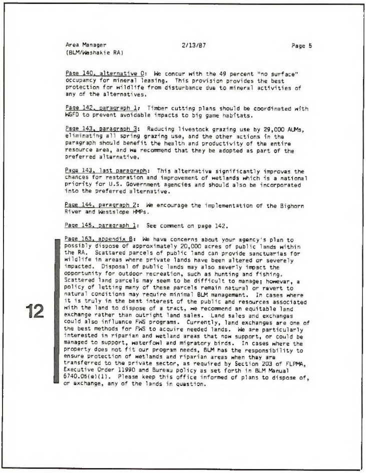
Page 29: We congratulate BLM on their efforts to improve public access to the Bighorn River corridor and other portions of the RA.

Page 32, second column, paragraph 4: See comments on page 29, second paragraph.

Page 103, preferred alternative, paragraph 2: A 95 percent surface occupancy allowance and 99 percent of the federal lands open for mineral leasing makes this portion of the alternative less desirable from a wildlife standpoint than alternative D.

Page 118, land uses, paragraph 3: See comment on page 27.

Page 118, land uses, paragraph 4: We concur with the elimination or significant reduction of spring grazing. This action would increase both the quality and quantity of forage available for wildlife, provided that late summer/early fall grazing does not remove excessive amounts of forage on winter and crucial winter big game ranges.



Area Manager 2/13/87 Page 5
(BLM/Washakie RA)

Page 140, alternative D: We concur with the 49 percent "no surface" occupancy for mineral leasing. This provision provides the best protection for wildlife from disturbance due to mineral activities of any of the alternatives.

Page 142, paragraph 1: Timber cutting plans should be coordinated with WGFD to prevent avoidable impacts to big game habitats.

Page 143, paragraph 3: Reducing livestock grazing use by 29,000 AUMs, eliminating all spring grazing use, and the other actions in the paragraph should benefit the health and productivity of the entire resource area, and we recommend that they be adopted as part of the preferred alternative.

Page 143, last paragraph: This alternative significantly improves the chances for restoration and improvement of wetlands which is a national priority for U.S. Government agencies and should also be incorporated into the preferred alternative.

Page 144, paragraph 2: We encourage the implementation of the Bighorn River and Westslope HMPs.

Page 145, paragraph 1: See comment on page 142.

12 Page 163, appendix B: We have concerns about your agency's plan to possibly dispose of approximately 20,000 acres of public lands within the RA. Scattered parcels of public land can provide sanctuaries for wildlife in areas where private lands have been altered or severely impacted. Disposal of public lands may also severly impact the opportunity for outdoor recreation, such as hunting and fishing. Scattered land parcels may seem to be difficult to manage; however, a policy of letting many of these parcels remain natural or revert to natural conditions may require minimal BLM management. In cases where it is truly in the best interest of the public and resources associated with the land to dispose of a tract, we recommend an equitable land exchange rather than outright land sales. Land sales and exchanges could also influence FWS programs. Currently, land exchanges are one of the best methods for FWS to acquire needed lands. We are particularly interested in riparian and wetland areas that now support, or could be managed to support, waterfowl and migratory birds. In cases where the property does not fit our program needs, BLM has the responsibility to ensure protection of wetlands and riparian areas when they are transferred to the private sector, as required by Section 203 of FLPMA, Executive Order 11990 and Bureau policy as set forth in BLM Manual 6740.06(e)(1). Please keep this office informed of plans to dispose of, or exchange, any of the lands in question.

analysis are found in Appendix M of the Final RMP/EIS.

106-9 The criteria listed in Appendix B, including criteria relating to crucial and critical wildlife habitats, wetlands and riparian areas, would be applied to any proposal for disposal of public lands.

106-10 The forage utilization objective identified in the plan is 50 percent for all uses. We are in the process of identifying areas that need additional forage for wildlife.

106-11 We have several years of monitoring data available on some of the existing AMPs. The current use in those allotments is monitored and livestock are removed when the appropriate use level is reached. Adjustments have been made on these allotments, but have not been formalized. The Wyoming Game and Fish Department is consulted during AMP development, on all vegetation manipulation projects, and on most types of range development projects.

106-12 We are not proposing or planning to dispose of 20,000 acres of public lands. We have listed tracts in Appendix B that may be suitable for disposal after a case-by-case application of the criteria listed. (The text on page 13 of the Draft RMP/EIS provides a more detailed explanation of the term "disposal.") It is desirable to use equitable exchange rather than sale whenever possible, when public lands are determined to be suitable for disposal.

SUMMARY

We recommend that all five WSAs be designated wilderness status.

The DEIS presents a number of management actions in the range of alternatives that would be an improvement over the status quo. The best alternative from our perspective is D, followed by the preferred alternative, C, A and B, in order of preference. We submit that the best alternative is a blend of features from the various alternatives presented in the EIS (Refer to attachment). We encourage BLM to implement these management actions by providing both management direction and adequate staffing and funding to carry out the chosen RMP.

Our Helena of Endangered Species office provided comments on the RMP in a letter to the BLM State Director, dated December 24, 1986. Their comments should be incorporated into the final EIS.

If you have any questions, I can be reached at FTS: 328-2374 or (307) 772-2374.

Arthur Anderson

Attachment (1)

cc:
Assistant Regional Director, USFWS, Denver, CO (FWE-60120)
Field Supervisor, USFWS, Billings, MT (ES-61410)
Field Supervisor, USFWS, Helena, MT (SE-61130)
Director, WGFD, Cheyenne, WY
ES/BEC Washington, D.C.

SUMMARY

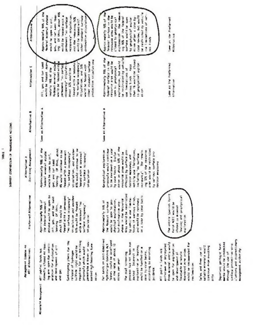


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TABLE 1 (Continued)

SUMMARY COMPARISON OF MANAGEMENT ACTIONS

	Management Common to All Alternatives	Preferred Alternative	Alternative A (Existing Management)	Alternative B	Alternative C	Alternative D
Forest Management (Continued)	Backlogs of reforestation projects would be eliminated Silvicultural practices would be allowed in elk calving areas if they benefit habitat					
Wild Horse Management		All wild horses would be removed from the Zimmerman Springs area	The wild horse herd would remain in the Zimmerman Springs area and horse numbers would continue to increase. Forage would not be allocated to wild horses. Livestock grazing capacity would not be adjusted because of horses. A wild horse herd management plan would not be written and a wild horse herd management area would not be designated	Same as the Preferred Alternative	A wild horse herd management area would be designated and a herd management area plan would be written. Forage would be allocated to wild horses and livestock AUMs would be adjusted accordingly. Wild horse numbers would be limited to 30 animals Riparian areas along Blueter Creek would be fenced to exclude wild horses and protect wetland/riparian habitat.	Same as the Preferred Alternative
Range Management	All "I" category allotments and some "M" and "C" would be monitored. Monitoring would continue after adjustments. Approximately 1,800 existing range projects would be maintained Authorized grazing use would be adjusted for the 300-800 acres taken out of production each year by mineral patents, other disposals and other permanent uses.	The maximum authorized level of livestock grazing use would be 143,000 AUM's, annually, on the Resource Area's 307 allotments, until data is available to support adjustments	The maximum authorized livestock grazing use would be 143,000 AUMs annually, on the Resource Area's 307 allotments	Authorized grazing use levels would increase to an estimated 182,300 AUMs per year at the end of 10 years from RMP implementation. Livestock grazing would occur on all 307 allotments in the Resource Area until adequate data is available to support adjustment	Same as the Preferred Alternative	Authorized livestock grazing use would be about 111,000 AUMs, annually. Grazing would be eliminated on an undetermined number of allotments

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TABLE 1 (Continued)

SUMMARY COMPARISON OF MANAGEMENT ACTIONS

	Management Common to All Alternatives	Preferred Alternative	Alternative A (Existing Management)	Alternative B	Alternative C	Alternative D
Lands and Realty Management	Disposal and acquisition of public lands would be considered on a case-by-case basis under each of the alternatives	Existing transportation and utility corridors would be designated for existing and future rights-of-way grants. Approximately 250 acres not in corridors would be classed as exclusion areas and 388,000 acres would be classed as avoidance areas	All areas would continue to be open to rights-of-way, although sensitive areas would be avoided when possible	Existing transportation and utility corridors would be designated for existing and future rights-of-way grants. Approximately 250 acres not in corridors would be classed as exclusion areas and 250 acres would be classed as avoidance areas	Same as the Preferred Alternative	Existing transportation and utility corridors would be designated for existing and future rights-of-way grants. Approximately 250 acres not in corridors would be classed as exclusion areas and 938,000 acres would be classed as avoidance areas.
	Public water reserves withdrawn under Secretarial Order 107 & other classification orders would be reviewed for retention. Withdrawals would be terminated on those that do not meet retention requirements	Classification and Multiple Use Act classifications in Hot Springs County would be terminated	Lands classified under the Classification and Multiple Use Act would continue to be managed pursuant to the terms of the classification.	Same as the Preferred Alternative	Same as the Preferred Alternative	Same as the Preferred Alternative
		The administrative site withdrawal associated with Worland's golf course would be terminated	The administrative site withdrawal associated with Worland's golf course would be retained	Same as Alternative A	Same as the Preferred Alternative	Same as the Preferred Alternative
Forest Management	Cottonwood would not be harvested or sold for fuel wood in riparian areas along low-lying ephemeral streams Timber harvesting on commercial forest land would be conducted in a manner that would benefit watershed or wetland/riparian habitat Backlogs of precommercial thinning projects would be eliminated. Regular thinning of overstocked stands would continue	A maximum of 1 million board feet of forest products would be harvested from about 130 acres, annually, for about ten years	A maximum of 375 thousand board feet of forest products would be harvested from about 40 acres annually for about 10 years	A maximum of 1.2 million board feet of forest products would be harvested from about 150 acres, annually, for about ten years	Same as the Preferred Alternative	A maximum of 700 thousand board feet of forest products would be harvested from about 90 acres, annually, for about ten years

TABLE 1 (Continued)

SUMMARY COMPARISON OF MANAGEMENT ACTIONS

	Management Common to All Alternatives	Preferred Alternative	Alternative A (Existing Management)	Alternative B	Alternative C	Alternative D
Range Management (Continued)		would be placed on adjusting spring grazing and on allotments without designated seasons of use				
		Approximately 500 acres of aspen stands would be protected from livestock grazing, at the rate of about 25 acres per year			Same as the Preferred Alternative	Approximately 500 acres of aspen stands would be protected from livestock grazing, at a rate of about 50 acres per year.
		Adjustments in grazing use on "I" category allotments would be based on monitoring or by agreement between BLM and the allotment holder.	Monitoring of existing AMPs would continue	Monitoring studies would be established to determine adjustments in grazing use.		Monitoring studies would be used to determine the level of adjustment needed in each allotment.
		Range would be managed for good or better condition on 960,000 acres over the long-term		Range site condition would be raised one class or be maintained at its current condition. All range would be in good or better condition over the long-term	Same as the Preferred Alternative	Range would be managed to attain and maintain good or better condition.
Cultural Resource Management	The archeological district nomination for [illegible] Canyon would be completed. Salvage projects and emergency site stabilization on known sites would be undertaken. Important paleontological sites would be protected through the use of surface and subsurface protection stipulations and discretionary management authority.					
Wilderness Management	See Wilderness Supplement					

TABLE 1 (Continued)

SUMMARY COMPARISON OF MANAGEMENT ACTIONS

	Management Common to All Alternatives	Preferred Alternative	Alternative A (Existing Management)	Alternative B	Alternative C	Alternative D
Range Management (Continued)	Approximately 2,000 AUMs of forage would be allocated to trailing in specific stock driveways. Public access to facilitate range management would be acquired in specific locations	An average of 3 AMP's (new plans or revisions of existing plans on "I" category allotments) would be worked on, annually	Existing allotment management plans would be maintained. No new plans would be written.	Eighteen existing allotment management plans would be implemented and maintained. New AMPs grazing systems or development plans would be developed annually on "I" category allotments.	Same as the Preferred Alternative	A maximum of 3 AMPs would be written or revised annually, on "I" category allotments.
	Any range project proposal would be subject to economic and environmental analyses.	Priority would be given to implementation of range projects on "I" category allotments. Projects on "M" and "C" category allotments may also be be developed	No new range projects would be developed except on those areas covered by existing allotment management plans.	"I" category allotments would receive priority for the funding of range projects and development of grazing management systems. Some private construction of range projects in "C" and "M" category allotments would be authorized, subject to specific constraints.	Same as the Preferred Alternative	New range projects would be implemented on "I" category allotments.
		Livestock grazing would be managed in wetland/riparian areas to allow improvement of habitat conditions. About 105 miles of fencing needed to protect wetland/riparian habitat would be built at the rate of about 10 miles, annually. New grazing systems would be implemented to restore and enhance wetlands.		Livestock grazing would be managed in wetland/riparian areas to allow improvement of habitat conditions. About 105 miles of fencing needed to protect wetland/riparian habitat would be built at the rate of about 5 miles, annually.	Same as the Preferred Alternative	Livestock grazing would be managed in wetland/riparian areas to allow improvement of habitat conditions. About 105 miles of fencing needed to protect wetland/riparian habitat would be built at the rate of 15 miles, annually.
		Seasons of use would be established on allotments that currently have no seasons of use designated.		Seasons of use would be established on allotments that currently have no season of use designated.	Same as the Preferred Alternative	Same as the Preferred Alternative
		Adjustments in season of use and kind and class of livestock would be made to improve vegetative resources. Emphasis		Management practices such as changes in the season of use and use of key forage species would be implemented to improve range condition.	Same as the Preferred Alternative	Same as Alternative B

TABLE 1 (Continued)

SUMMARY COMPARISON OF MANAGEMENT ACTIONS

	Management Common to All Alternatives	Preferred Alternative	Alternative A (Existing Management)	Alternative B	Alternative C	Alternative D
Recreation Management (Cont.)		The Billy Miles Habitat Unit Agreement would be updated and renewed.			Same as the Preferred Alternative	
		A signing program would be implemented to facilitate use in certain areas.			Same as the Preferred Alternative	
Fish & Wildlife Habitat Management	The West Slope and Bighorn River Habitat Management plans would be fully implemented.	Certain areas within the Resource Area would be managed to allow peregrine falcons and antelope to be reintroduced.			Same as the Preferred Alternative	Same as the Preferred Alternative
	Wetlands would be managed to maintain and improve habitat through implementation of changes in livestock grazing systems and specific practices contained in habitat management plans.	Vehicle, horseback, and pedestrian access would be limited in crucial habitats to aid in their protection.	Access controls would occur only in specific situations and in specific habitats.	Same as Alternative A	Same as the Preferred Alternative	Same as the Preferred Alternative
	Wildlife habitat management would emphasize protection of habitat from destruction or negative impacts, and would encourage habitat development or manipulation.	Chemical control of pests would be restricted in the Spanish Point Karst ACEC, but would be allowed elsewhere with appropriate restrictions to protect food chains, habitat and wetlands.	Chemical control of pests would be allowed resource area-wide with appropriate restrictions.	Same as Alternative A	Same as the Preferred Alternative	Same as the Preferred Alternative
			Wetland/riparian zones would be protected by fencing. About 105 miles of needed fencing would be built at the rate of about 2 miles annually.			
Threatened and Endangered Wildlife Species	Habitat or potential habitat for threatened and endangered species, and sensitive species identified by the State of Wyoming, would be protected and managed to benefit those species.					

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TABLE 1 (Continued)

SUMMARY COMPARISON OF MANAGEMENT ACTIONS

	Management Common to All Alternatives	Preferred Alternative	Alternative A (Existing Management)	Alternative B	Alternative C	Alternative D
Off-Road Vehicle Management		Limitations on ORV use would be applied throughout the Resource Area. About 6,700 acres would be closed to vehicle use. No areas would be designated open for ORV use.	Existing interim vehicle limitations would be adopted for ORV management. The remainder of the resource area would remain open for ORV use.	Limitations on ORV use would be applied to about 666,700 acres in the resource area. About 750 acres would be closed to ORV use and 561,000 acres would be designated open.	Same as the Preferred Alternative	Limitations on ORV use would be applied throughout the resource area. About 126,000 acres would be closed to vehicle use. No areas would be designated open for ORV use.
Recreation Management	The Castle Gardens and Middle Fork campgrounds and the Lone Tree trailhead would be maintained. Existing recreational access would be maintained.	Restrictions on recreational use would be limited to applicable ORV and cave use restrictions, and management plans written for special recreation management areas.	Restrictions on recreational use would be limited to applicable ORV restrictions and the use of caves.	Same as Alternative A	Same as the Preferred Alternative	Same as the Preferred Alternative
	Special recreation use permits would be issued to authorize organized recreational use. Recreation use of caves would be managed under a cave management plan.	Two Special Recreation Management Areas would be designated; one on the West Slope of the Bighorn Mountains, of 241,000 acres, another on the Bighorn River from Wedding of the Waters to Shell Creek, of about 59,000 acres.	Special recreation management areas would not be designated. Existing recreation management plans would be maintained. Instead, the entire resource area would be designated as an extensive recreation management area.	Same as Alternative A	Same as the Preferred Alternative	Same as the Preferred Alternative
	Recreation use would be managed to maintain or improve wetland habitat conditions along intensively used streams and reservoirs.	Recreational facilities would be developed at Castle Gardens, the Middle Fork camping area, and on Deep, Otter, and Medicine Lodge creeks.	New recreational facilities would not be developed.	Same as Alternative A	Same as the Preferred Alternative	Recreation facilities would be developed at the Middle Fork camping area, and on Deep Creek.
		Cave use permits would be issued to qualified users.	Cave use permits would continue to be issued to qualified users.	Same as the Preferred Alternative	Same as the Preferred Alternative	Permits for cave use would be limited to protect cave resources.
		Access to caves would be obtained under certain circumstances.			Same as the Preferred Alternative	Access to caves on west slope canyons would be controlled.
		Acquisition of legal and/or physical access would be considered for recreational activities.			Same as the Preferred Alternative	

TABLE 1 (Continued)

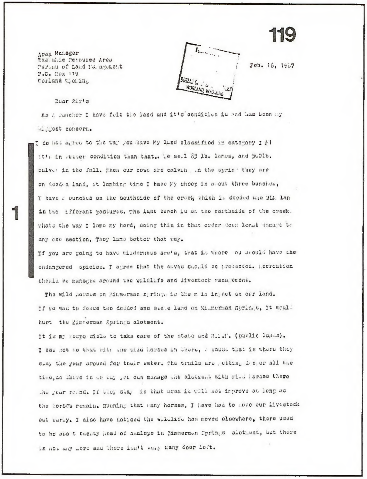
SUMMARY COMPARISON OF MANAGEMENT ACTIONS

	Management Common to All Alternatives	Preferred Alternative	Alternative A (Existing Management)	Alternative B	Alternative C	Alternative D
Watershed Management (Cont.)		Management of the Spanish Point Karst ACEC would emphasize watershed protection by restricting or prohibiting certain activities. Withdrawals from mineral leasing and mining claim location would be pursued for the entire ACEC.	Management of the Spanish Point Karst ACEC would continue within the framework of existing management practices and surface protection stipulations.	Management of the Spanish Point Karst ACEC would entail the use of standard stipulations and existing management practices for surface protection as well as special stipulations for protection of subsurface values.	Management of the Spanish Point Karst ACEC would emphasize watershed protection by restricting or prohibiting certain activities. "No surface occupancy" stipulations would be applied to hydrocarbon leases.	Same as the Preferred Alternative
		The reduction of soil erosion and sediment yields would be emphasized on about 391,000 acres sensitive watersheds in the Kirby, Nowater, and East Fork Nowater Creek drainages.			Same as the Preferred Alternative	Same as the Preferred Alternative
Fire Management	Reclamation and soil stabilization actions and livestock grazing controls would be applied to burned areas. Prescribed burns would be used to achieve vegetation management objectives. Limited suppression of wildfires would occur on wetland/riparian areas.	Full suppression of wildfires would occur on about 203,400 acres. Limited suppression of wildfires would occur on about 530,300 acres	Full suppression of all wildfires would continue resource area-wide, with some restrictions within sensitive areas.	Same as the Preferred Alternative	Same as the Preferred Alternative	Same as the Preferred Alternative

TABLE 1 (Continued)

SUMMARY COMPARISON OF MANAGEMENT ACTIONS

	Management Common to All Alternatives	Preferred Alternative	Alternative A (Existing Management)	Alternative B	Alternative C	Alternative D
Threatened and Endangered Species (Cont.)	A clearance or a Biological assessment would be prepared for any activity proposed in endangered, threatened, or sensitive species habitat.					
Hazardous Waste Management	Regulated hazardous wastes that are discharged on public lands would be secured, disposed of or otherwise remedied in accordance with EPA, BLM, and State regulations.					
Watershed Management	The Spanish Point Karst Area would be designated an area of critical environmental concern.	Water discharges from mining, wastewater treatment, etc. would be regulated. Discharges would not be allowed in some areas.	Water discharges from mining, wastewater treatment, etc., would be regulated.	Same as Alternative A	Same as the Preferred Alternative	Same as the Preferred Alternative
	All watershed projects would be maintained on a priority basis. Oil and gas exploration wells and geophysical drill holes that produce water may be acquired by BLM, developed, and managed for livestock, wildlife, or recreation.	Special wildfire suppression restrictions would be applied above linking stream segments and caves to protect water quality and watershed values.			Same as the Preferred Alternative	Same as the Preferred Alternative
	All water-related projects would be filed with the Wyoming State Engineers Office to obtain valid water rights.	Chemical control of pests would be restricted in the Spanish Point Karst ACEC, but would be allowed elsewhere with appropriate restrictions to avoid water pollution.	Chemical control of pests would be allowed resource area-wide, with appropriate restrictions to avoid water pollution.	Same as Alternative A	Same as the Preferred Alternative	Same as the Preferred Alternative
		Protection of watersheds would include the use of BMPs and other management actions.	Protection of watersheds would be based on the use of standard protective stipulations rather than on project development.	Same as Alternative A	Same as the Preferred Alternative	Same as the Preferred Alternative



119

Area Manager
Washakie Resource Area
Bureau of Land Management
P.O. Box 119
Worland Wyoming

BUREAU [illegible]
WORLAND, WYOMING

Feb. 16, 1987

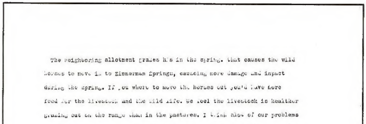
Dear Sir's

As a rancher I have felt the land and it's condition is and has been my biggest concern.

1 I do not agree to the way you have My land classified in category I #1 It's in better condition than that.. We sell 85 lb. lambs, and 500lb. calves in the fall. When our cows are calving in the spring they are on deeded land, at lambing time I have My sheep in about three bunches, I have 2 bunches on the southside of the creek, which is deeded and BLM lan in two different pastures. The last bunch is on the northside of the creek. Thats the way I lamb my herd, doing this in that order does least damage to any one section. They lamb better that way.

If you are going to have wilderness are's, that is where you should have the endangered spicies. I agree that the caves should be protected. Recreation should be managed around the wildlife and livestock management.

The wild horses on Zimmerman springs is the main impact on our land. If we was to fence the deeded and state land on Zimmerman Springs, It would hurt the Zimmerman Springs alotment. It is my responsible to take care of the state and B.L.M. (public lands). I can not do that with the wild horses in there, because that is where they stay the year around for their water. The trails are getting deeper all the time, so there is no way you can manage the alotment with wild horses there the year round. If they stay in that area it will not improve as long as the horses remain. Running that many horses, I have had to move our livestock out early. I also have noticed the wildlife has moved elsewhere, there used to be about twenty head of analope in Zimmerman Springs alotment, but there is not any more and there isn't very many deer left.

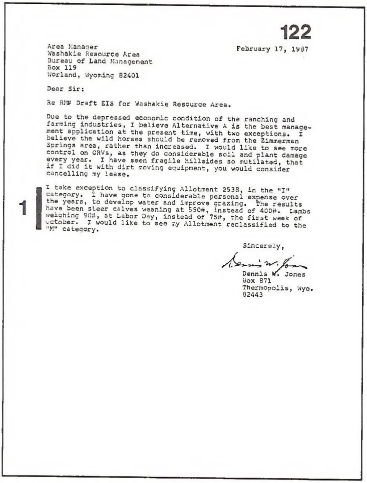


The neighboring allotment grazes h's in the spring. that causes the wild horses to move in to Zimmerman Springs, causeing more damage and impact during the spring. If you where to move the horses out you'd have more feed for the livestock and the wild life. We feel the livestock is healther grazing out on the range than in the pastures. I think alot of our problems in the western states, is that the importing countries are fighting our industry, I feel that grazing managment and perdatory control are my main concerns as a rancher.

Sincerity yours
DAVID C JONES
David C. Jones

Response to Letter 119

119-1 The criteria used in categorizing allotments is in Appendix C of the Draft RMP/EIS. Current ecological range condition ("condition") is only one of the categorization criteria used.



122

Area Manager
Washakie Resource Area
Bureau of Land Management
Box 119
Worland, Wyoming 82401

February 17, 1987

Dear Sir:

Re RMP Draft EIS for Washakie Resource Area.

Due to the depressed economic condition of the ranching and farming industries, I believe Alternative A is the best management application at the present time, with two exceptions. I believe the wild horses should be removed from the Zimmerman Springs area, rather than increased. I would like to see more control on ORVs, as they do considerable soil and plant damage every year. I have seen fragile hillsides so mutilated, that if I did it with dirt moving equipment, you would consider cancelling my lease.

1 I take exception to classifying Allotment 2538, in the "I" category. I have gone to considerable personal expense over the years, to develop water and improve grazing. The results have been steer calves weaning at 550#, instead of 400#. Lambs weighing 90#, at Labor Day, instead of 75#, the first week of October. I would like to see my Allotment reclassified to the "M" category.

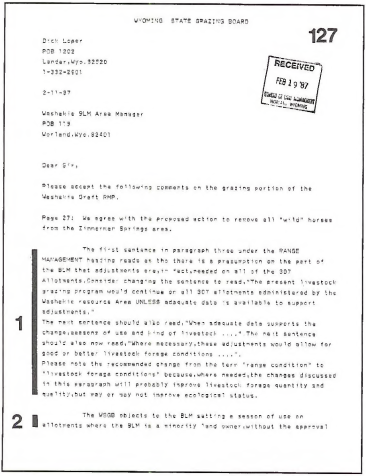
Sincerely,

Dennis W. Jones

Dennis W. Jones
Box 871
Thermopolis, Wyo.
82443

Response to Letter 122

122-1 The criteria used in categorizing allotments is in Appendix C of the Draft RMP/EIS. Allotment 2538 fits several of the "I" category criteria. If, after monitoring this allotment, a determination is made that it better fits the "M" category, it will be recategorized.



WYOMING STATE GRAZING BOARD

127

Dick Loper
POB 1202
Lander,Wyo.82520
1-332-2901

RECEIVED
FEB 19 '87
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

2-11-87

Washakie BLM Area Manager
POB 119
Worland,Wyo.82401

Dear Sir,

Please accept the following comments on the grazing portion of the Washakie Draft RMP.

Page 27: We agree with the proposed action to remove all "wild" horses from the Zimmerman Springs area.

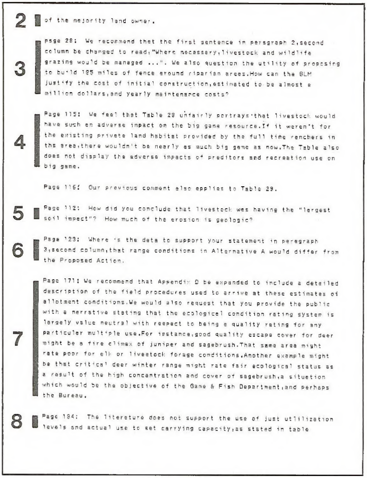
1 The first sentence in paragraph three under the RANGE MANAGEMENT heading reads as tho there is a presumption on the part of the BLM that adjustments are,in fact,needed on all of the 307 Allotments.Consider changing the sentence to read,"The present livestock grazing program would continue on all 307 allotments administered by the Washakie resource Area UNLESS adaquate data is available to support adjustments."
The next sentence should also read,"When adaquate data supports the change,seasons of use and kind of livestock ....". The next sentence should also now read,"Where necessary,these adjustments would allow for good or better livestock forage conditions ....".
Please note the recommended change from the term "range condition" to "livestock forage conditions" because,where needed,the changes discussed in this paragraph will probably improve livestock forage quantity and quality,but may or may not improve ecological status.

2 The WSGB objects to the BLM setting a season of use on allotments where the BLM is a minority land owner,without the approval

Response to Letter 127

127-1 As suggested in the comment, we have modified the text to read that livestock grazing would continue on all allotments **unless** adequate data are available to support adjustments. The BLM manages rangelands for ecological condition not for livestock forage condition. The comment seems to suggest the application of a resource value rating for each range site in the resource area. A rating would have to be applied to each plant species and type of use on each range site. This level of detail is appropriate for activity plans (allotment or habitat management plans), not the RMP/EIS. The use of ecological potential allows a comparison of current conditions of various sites because all rangeland condition ratings are tied to it. Livestock forage condition is only one of several ratings making up ecological potential.

127-2 Both the Code of Federal Regulations (43 CFR 4130.6-1[a]) and FLPMA (Section 402[e]) provide for establishing seasons of use for permits and leases administered by the BLM.



2 of the majority land owner.

3 Page 28: We recommend that the first sentence in paragraph 2,second column be changed to read,"Where necessary,livestock and wildlife grazing would be managed ...". We also question the utility of proposing to build 185 miles of fence around riparian areas.How can the BLM justify the cost of initial construction,estimated to be almost a million dollars,and yearly maintenance costs?

4 Page 115: We feel that Table 28 unfairly portrays that livestock would have such an adverse impact on the big game resource.If it weren't for the existing private land habitat provided by the full time ranchers in the area,there wouldn't be nearly as much big game as now.The Table also does not display the adverse impacts of preditors and recreation use on big game.

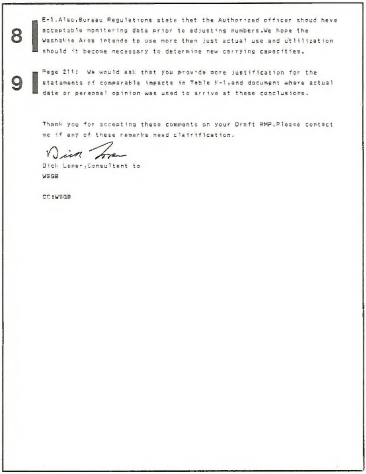
Page 116: Our previous comment also applies to Table 29.

5 Page 112: How did you conclude that livestock was having the "largest soil impact"? How much of the erosion is geologic?

6 Page 123: Where is the data to support your statement in paragraph 3,second column,that range conditions in Alternative A would differ from the Proposed Action.

7 Page 171: We recommend that Appendix D be expanded to include a detailed description of the field procedures used to arrive at these estimates of allotment conditions.We would also request that you provide the public with a narrative stating that the ecological condition rating system is largely value neutral with respect to being a quality rating for any particular multiple use.For instance,good quality escape cover for deer might be a fire climax of juniper and sagebrush.That same area might rate poor for elk or livestock forage conditions.Another example might be that critical deer winter range might rate fair ecological status as a result of the high concentration and cover of sagebrush,a situation which would be the objective of the Game & Fish Department,and perhaps the Bureau.

8 Page 184: The literature does not support the use of just utilization levels and actual use to set carrying capacity,as stated in table



8 E-1.Also,Bureau Regulations state that the Authorized officer shoud have acceptable monitering data prior to adjusting numbers.We hope the Washakie Area intends to use more than just actual use and utilization should it become necessary to determine new carrying capacities.

9 Page 211: We would ask that you provide more justification for the statements of comparable impacts in Table K-1,and document where actual data or personal opinion was used to arrive at these conclusions.

Thank you for accepting these comments on your Draft RMP.Please contact me if any of these remarks need clairification.

Dick

Dick Loper,Consultant to
WSGB

CC:WSGB

127-3 While the cost of construction of the proposed fencing around riparian areas may, in fact, be close to a million dollars, those costs would be spread over nearly 20 years. Benefit/cost considerations are a part of the decision-making process as individual projects are brought through the planning process. Similar arguments, both pro and con, can be applied to the cost effectiveness and reasonableness of proposing the construction of some 200 miles of fences in grazing allotments (page 27 of the Draft RMP/EIS).

127-4 The estimates of impacts on big game habitat in Tables 28 and 29 represent the predicted improvement or deterioration of habitat assuming the prescriptions for forestry, mineral exploration and development, and livestock grazing are fully implemented on schedule. Thus, the impacts on big game habitat may vary from the estimates.

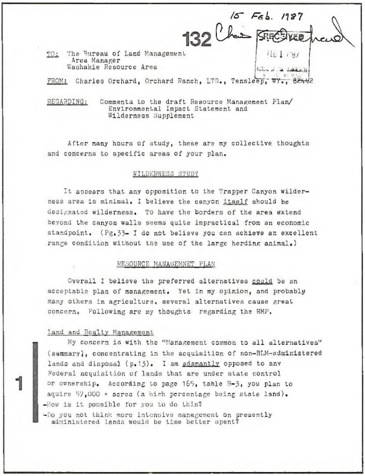
127-5 Chapter 3 (The Affected Environment) of the Draft RMP/EIS, on page 71, describes natural total and accelerated erosion rates. The Glossary also defines accelerated soil loss. Through field observations, measurements, and literature references, we have determined the erosion rates attributable to livestock grazing. Impacts from livestock grazing are the largest share of the overall erosion impacts now occurring on public lands in the planning area.

127-6 In the analysis of environmental consequences for Alternative A and the Preferred Alternative, predictions of range condition in terms of percentages (e.g., 10 percent in excellent condition) are based on the professional judgement of staff range conservationists. Since Alternative A is the "no action" alternative, we expect the current range condition to remain basically unchanged; range conditions would decline on "I" category allotments, improve or remain unchanged on "M" category allotments, remain unchanged on "C" category allotments, and improve on allotments having AMPs. With the level of development of new AMPs or the revision of existing AMPs proposed in the Preferred Alternative, we expect an increase over the long-term in the acreage in good or excellent range condition.

127-7 Appendix D has been modified to include a summary of site mapping (inventory) procedures. The Glossary includes a reference to ecological condition, which explains that ecological condition is not a habitat or forage quality rating.

127-8 The Preferred Alternative (page 28 of the Draft RMP/EIS) states that ". . . monitoring would include actual use, utilization and climate to estimate the level of needed adjustment." We have modified Table E-1 in an attempt to clarify the management response to livestock use in excess of carrying capacity.

127-9 Table K-1 displays comparative estimates of the positive and negative impacts of various activities on wetland/riparian areas. All of the tabular information was derived from data gathered and observations made by BLM staff specialists and represents the best professional judgement of those specialists.



15 Feb. 1987

132 Chas Orchard

RECEIVED

TO: The Bureau of Land Management
Area Manager
Washakie Resource Area

FROM: Charles Orchard, Orchard Ranch, LTD., Tensleep, WY., 82442

REGARDING: Commenta to the draft Resource Management Plan/
Environmental Impact Statement and
Wilderness Supplement

After many hours of study, these are my collective thoughts and concerns to specific areas of your plan.

WILDERNESS STUDY

It appears that any opposition to the Trapper Canyon wilderness area is minimal. I believe the canyon itself should be designated wilderness. To have the borders of the area extend beyond the canyon walls seems quite impractical from an economic standpoint. (Pg.33- I do not believe you can achieve an excellent range condition without the use of the large herding animal.)

RESOURCE MANAGEMNET PLAN

Overall I believe the preferred alternatives could be an acceptable plan of management. Yet in my opinion, and probably many others in agriculture, several alternatives cause great concern. Following are my thoughts regarding the RMP.

Land and Realty Management

1 My concern is with the "Management common to all alternatives" (summary), concentrating in the acquisition of non-BLM-administered lands and disposal (p.13). I am adamantly opposed to any Federal acquisition of lands that are under state control or ownership. According to page 165, table B-3, you plan to aquire 57,000 + acres (a high percentage being state land).

-How is it possible for you to do this?

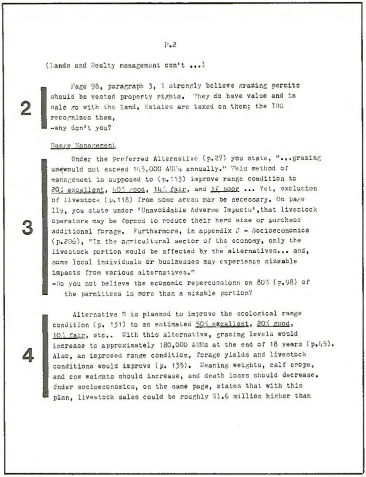
-Do you not think more intensive management on presently administered lands would be time better spent?

Response to Letter 132

132-1 The BLM is authorized to undertake exchanges of land under Section 206 of the Federal Land Policy and Management Act. There would be no federal acquisition of land without transfer of public lands to the state or other entity in an equal value exchange. Land exchanges would be used to block-up public lands, dispose of small, isolated tracts, or acquire lands with special values tied to values on public lands. Refer to the criteria for disposal and acquisition in Appendix B and to responses 96-1 and 106-6.

132-2 Refer to response 96-9.

132-3 The paragraph referenced in the Draft RMP/EIS indicates that 80 percent of BLM permittees rely heavily on public lands and would be affected by changes in BLM grazing policy. It does not specifically state whether impacts are positive or negative. The comment infers that all changes as a result of changes in policy would be negative. However, not all BLM permittees would be adversely affected by those changes.



P.2

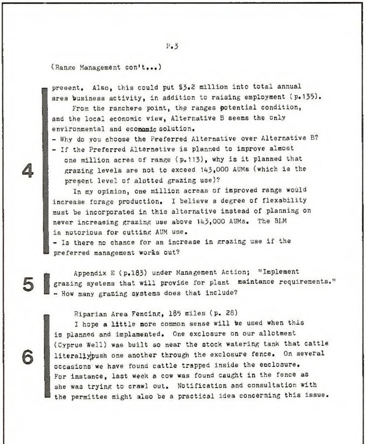
(Lands and Realty management con't ...)

2 Page 98, paragraph 3, I strongly believe grazing permits should be vested property rights. They do have value and in sale go with the land. Estates are taxed on them; the IRS recognizes them,
-why don't you?

Range Management

3 Under the Preferred Alternative (p.27) you state, "...grazing use would not exceed 143,000 AUMs annually." This method of management is supposed to (p.113) improve range condition to 20% excellent, 40% good, 14% fair, and 1% poor ... Yet, exclusion of livestock (p.118) from some areas may be necessary. On page 119, you state under 'Unavoidable Adverse Impacts',that livestock operators may be forced to reduce their herd size or purchase additional forage. Furthermore, in appendix J - Socioeconomics (p.206), "In the agricultural sector of the economy, only the livestock portion would be affected by the alternatives... and, some local individuals or businesses may experience sizeable impacts from various alternatives."
-Do you not believe the economic repercussions on 80% (p.98) of the permittees is more than a sizable portion?

4 Alternative B is planned to improve the ecological range condition (p. 131) to an estimated 50% excellent, 20% good, 10% fair, etc.. With this alternative, grazing levels would increase to approximately 180,000 AUMs at the end of 18 years (p.45). Also, an improved range condition, forage yields and livestock conditions would improve (p. 135). Weaning weights, calf crops, and cow weights should increase, and death loses should decrease. Under socioeconomics, on the same page, states that with this plan, livestock sales could be roughly $1.6 million higher than



P.3

(Range Management con't...)

4 present. Also, this could put $3.2 million into total annual area business activity, in addition to raising employment (p.135).
From the ranchers point, the ranges potential condition, and the local economic view, Alternative B seems the only environmental and economic solution.
- Why do you choose the Preferred Alternative over Alternative B?
- If the Preferred Alternative is planned to improve almost one million acres of range (p.113), why is it planned that grazing levels are not to exceed 143,000 AUMs (which is the present level of alotted grazing use)?
In my opinion, one million acreas of improved range would increase forage production. I believe a degree of flexability must be incorporated in this alternative instead of planning on never increasing grazing use above 143,000 AUMs. The BLM is notorious for cutting AUM use.
- Is there no chance for an increase in grazing use if the preferred management works out?

5 Appendix E (p.183) under Management Action; "Implement grazing systems that will provide for plant maintance requirements."
- How many grazing systems does that include?

6 Riparian Area Fencing, 185 miles (p. 28)
I hope a little more common sense will be used when this is planned and implamented. One exclosure on our allotment (Cyprus Well) was built so near the stock watering tank that cattle literally push one another through the exclosure fence. On several occasions we have found cattle trapped inside the enclosure. For instance, last week a cow was found caught in the fence as she was trying to crawl out. Notification and consultation with the permittee might also be a practical idea concerning this issue.

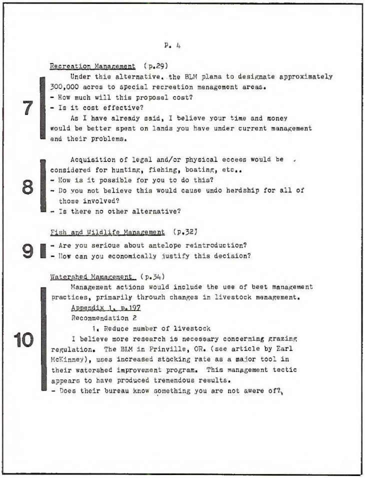
132-4 Alternative B has impacts and costs that negatively affect both range management and other uses of the public lands compared to the Preferred Alternative. While Alternative B may seem to be best in terms of livestock grazing, impacts to the range and to other uses or resources from livestock grazing may be unacceptable. Alternative B, in some cases, proposes more restrictive grazing practices, such as the elimination of "no season of use" designations on allotments and reductions in the use of spring grazing. Depending on the point of view, Alternative B may not even be the best for livestock grazing. Refer also to response 96-2.

Any adjustments in authorized grazing use would be made on a case-by-case basis. Over the long-term, total authorized use may actually be more or less than 143,000 AUM's. Use would continue at current levels until information is available to support adjustments. As a point of clarification, no adjudicated adjustments in livestock grazing have occurred in the Washakie Resource Area since 1966. Some adjustments resulting from implementation of grazing systems or because of patents of public land have been made.

132-5 Grazing systems include, but are not limited to, allotment management plans (AMPs), which are intensively managed grazing systems. Season-long grazing is a form of grazing system, as is no grazing. All allotments currently have, and will continue to have, some form of grazing system. Thus, we have no accurate projection of how many grazing systems would be implemented. The systems to be used depend on the character of the individual allotments, and could be as complex as full-scale AMPs. The AMPs would be worked on at the average rate of three a year, according to the Preferred Alternative (page 28 of the Draft RMP/EIS).

132-6 Refer to response 96-3.

132-7 The Special Recreation Management Area (SRMA) designation is used to focus management attention on areas of outstanding recreation resources and recreation opportunities or on areas where problems exist with recreation use. The designation and the SRMA activity plan do not necessarily result in increased expenditures. Rather, they direct the recreation related manpower and funding we do have to reduce problems and enhance opportunities using the most cost effective methods possible. One further point of clarification: The lands in the SRMA are currently being managed for recreation use. The SRMA is simply a method to enhance management of those lands.



P. 4

Recreation Management (p.29)

7 Under thie alternative. the BLM plana to designate approximately 300,000 acres to special recreation management areas.
- How much will this proposel cost?
- Is it cost effective?

As I have already said, I believe your time and money would be better spent on lands you have under current management end their problems.

8 Acquisition of legal and/or physical eccees would be considered for hunting, fiehing, boating, etc..
- How is it possible for you to do this?
- Do you not believe this would cause undo herdship for all of those involved?
- Is there no other alternative?

Fish and Wildlife Management (p.32)

9
- Are you serioue about antelope reintroduction?
- How can you economically justify this deciaion?

Watershed Mamagement (p.34)

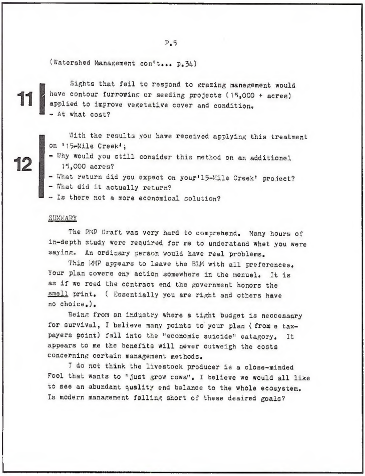
10 Management actions would include the uee of beet management practices, primarily through changes in livestock menagement.

Appendix 1, p.197

Recommendation 2

1. Reduce number of livestock

I believe more research is necessary concerning grazing regulation. The BLM in Prinville, OR. (see article by Earl McKinney), uses increased stocking rate as a major tool in their watershed improvement program. This management tectic appears to have produced tremendous results.
- Does their bureau know something you are not awere of?



P.5

(Watershed Management con't... p.34)

11 Sights that feil to respond to grazing manegement would have contour furrowing or seeding projects (15,000 + acres) applied to improve vegetative cover and condition.
- At what cost?

12 With the results you have received applying this treatment on '15-Mile Creek';
- Why would you still consider this method on an additionel 15,000 acres?
- What return did you expect on your'15-Mile Creek' project?
- What did it actuelly return?
- Is there not a more economical solution?

SUMMARY

The RMP Draft was very hard to comprehend. Many hours of in-depth study were required for me to underatand whet you were saying. An ordinary person would have real problems.

This RMP appears to leave the BLM with all preferencee. Your plan covere eny action somewhere in the menuel. It is as if we reed the contract end the government honors the small print. (Essentially you are right and others have no choice.).

Being from an industry where a tight budget is neccessary for survival, I believe many points to your plan (from e tax-payers point) fall into the "economic suicide" catagory. It appears to me the benefits will never outweigh the costs concerning certain management methods.

I do not think the livestock producer is a close-minded Fool that wants to "just grow cowa". I believe we would all like to see an abundant quality end balance to the whole ecosystem. Is modern management falling short of these deaired goals?

132-8 We need to meet the increasing public demand to provide and maintain access to the public lands. Acquisition of foot, horseback or vehicle access to areas of the public lands having important recreation values should reduce conflicts between landowners and recreationists. Without suitable access, conflicts would only increase. We would acquire needed access by means of exchanges or easements and would work with landowners to develop cooperative management agreements for access and management of recreation use.

132-9 Refer to response 96-5.

132-10 The article by Earl McKinney endorses the use of intensive, short duration grazing which may involve a temporary increase in numbers. However, perhaps the most important aspect of that intensive use is regulating the season of use. (Refer to Appendix I, page 197 in the Draft RMP/EIS where we list "Regulating the type and season of use of livestock . . ." as a management practice.) Additionally, according to McKinney, the use of prescribed fire is an integral part of his approach to watershed improvement.

132-11 Refer to response 96-7.

132-12 Refer to response 96-7.

(Summary con't...)

However, there is a new resource management approach that (ecologically and economically) has yielded quite encouraging results. This approach is called, Holistic Resource Management (HRM). Earl McKinney (see article) has applied HRM and it seems to introduce an inspiring technique for the BLM in his district. For a branch of Government thats "bottom line" is resource management, I am surprised you are not more current and eager to explore better ways to attain your goals.

Therefore, I am literally proposing a challenge to anyone in your bureau; Range Cons, Biologists, Personnel Managers, whoever. to attend a HRM School. The Bureau seems to have many answers, but I wonder if they could be to some of the wrong questions.

Listed below are a few Government employees (in our locale) in the Resource management field that have attended a HRM school. I am sure none of them would mind giving you a few thoughts on the matter.

-Peter Husby (DNRC), Helena, MT.
-Keith Robertson (SCS), Hamilton, MT.
-Don Peterson (BLM), Now Castle, WY.
-Jim Darlinton (BLM), New Castle, WY.
-Steve Hartman (BLM), Glasgow, MT.
-Senator Charles Scott, Casper, WY.
-William Henry, Ag. Department, Casper College
-Don Victoran (SCS), Worland, WY.

Also included is a schedule of the HRM schools for the next two months. For more information contact, Don Sylvester. 2013 Whitecloud, NE. , Albuquerque, NM., 87112, (505) 291-0504.

By attending a HRM school, with an open mind, I strongly believe that you will be exposed to an exciting outlook and many thought provoking ideas.

Jan 87 Savory Letter

Applying HRM Where Wildlife Never Roamed

BY EARL McKINNEY
BUREAU OF LAND MANAGEMENT
PRINEVILLE, OREGON

Holistic Resource Management is just an abbreviated way of saying "Using all you know about ecology and psychology to do the best you can with what you have to work with." And that pretty well decribes my work on the Bear Creek watershed in Central Oregon. Dollars are mighty short these days, but I have some good people working with me in the BLM, and some real fine ranchers doing the livestock management, and we are going to turn this sad, bedraggled little watershed into a show place within the next 10 years.

What makes it interesting is that this area never had any bison to perform the ground-crunching, grass munching functions of the large grazing ungulate, and until the white man came with his livestock, it was terribly sterile and unproductive.

In the winter of 1825-26, Peter Skene Ogden and his band of Hudson's Bay fur trappers passed through the area. Ogden kept a journal and described the dismal landscape as it appeared then: "The hills below, as far as the eye can reach, covered with wormwood [sagebrush] . . . A more gloomy, barren looking country I never yet seen." After living off the land for two months in what is now some of the finest deer and elk country in Oregon, he wrote: "Our prospects gloomy we must continue to starve . . . all reduced to skin and bones and more beggarly wretched human beings I defy the world to produce." But of the streams themselves, he noted: "They are well-lined with willow and aspen."

Settlers, and 120 years of livestock use, have changed the land tremendously: we now have much more productive uplands, as evidenced by the output of game animals and of beef, but at the sacrifice of many of our riparian zones and considerable loss of topsoil from steep, dry slopes.

A lot of people have wondered what would happen if HRM were applied in an area that didn't have large herds of grazing wildlife in its past. Would the same principles apply? Let me tell you what we've been doing, and you can be the judge.

In the Prineville District, our major management challenge is the juniper-bunchgrass communities which occupy steeper slopes. Conventional livestock management has been ineffective in either slowing the advance of the juniper trees or in halting the erosion, which is severe.

Our first attack on the problem, begun some 15 years ago, was to cut down the trees and reduce the livestock numbers. Reducing livestock didn't accomplish much, but cutting the trees produced a rapid increase in understory vegetation — bunchgrass, sagebrush, rabbitbrush – and looked like the answer for about the first five years. But after five or six years, we could see that plant response seemed to have hit a plateau. And the plateau was too low: too much erosion was still occurring, and young juniper trees were returning thicker than ever.

We had a landscape goal for these uplands which was a grassland/juniper mosaic with about 70% grassland, 30% juniper — the juniper areas strategically left to give maximum cover for big game animals. We knew that fire in times past had played a role in this area, so we proceeded to phase two of our attack: we began to burn the old tree cutting areas. This left large bare areas which, if left unseeded.

Photo taken in the summer of 1977. The stream (and watershed) had suffered from over 100 years of season-long grazing, with productivity continually going downhill.

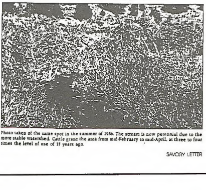


Photo taken of the same spot in the summer of 1986. The stream is now perennial due to the more stable watershed. Cattle graze the area from mid-February to mid-April, at three to four times the level of use of 15 years ago.

soon began to produce annual weeds. We couldn't afford to pull range drills all over the landscape, and in some cases couldn't, even if we wanted.

So we instituted phase three of our watershed improvement program: we put the cows to work and let their hooves plant the seeds which would drive succession past the annual weed stage and on toward perennial grasses.

> "...our watershed improvement program now has three phases – cut the juniper trees, wait a couple of years and then burn these trees and follow as soon as possible with livestock to let their hooves finish our work. Under this program we have increased ground cover by from 2 to 20 times; have seen raw gullies soften and heal; are still being surprised by springs appearing in unexpected places, and have perennial streams where we formerly saw only springtime flows. We're now producing trout for the first time in over 20 years."

The grazing management involved in HRM is dirt-simple. The hard part is the planning, especially the goal-setting. Once you know what you really want the landscape to look like, what you want to produce and the quality of life the people involved desire, the rest is easy.

Of the tools that can be applied, we've found animal impact to be the most powerful. Vigorous watersheds (in this environment) require vigorous, thick grass cover. Keeping grass vigorous requires that it be grazed regularly, so we try to get as much grass grazed as possible while controlling the time the livestock are in the pasture to minimize overgrazing. And dense grass cover requires that some platter-footed critter stomp down litter and make lots of deep tracks (litter and cow tracks provide the environment that the little weak-kneed perennial grass seedlings need in order to successfully germinate and establish).

Down on the creek bottoms, we use the cow in the same way, but the timing considerations are a little different. First, we want all the vegetation we can get to slow the water during spring runoff; and second, we want to promote willow growth, since willows are one of the finest water-slowing plants made. We know that late fall, winter or early spring grazing on willows stimulates them, but summer grazing really sets them back. So the grazing for willow growth would call for fall, winter or early spring grazing. But since we also want all possible vegetation for spring runoff (about February 15 to March 1 around here), this further limits us to late winter/early spring grazing on the pastures with the creeks. And since grazing is good, and stomping/tromping is good, we want all the cows the rancher can lay hands on to come into these pastures, either creek or upland. And ideally the cows should stay until every grass plant has been bitten once and just before they start biting plants a second time. Of course, we're way short of attaining that ideal, but we're working on it.

We burn in late summer when the fire will carry well, and then bring in all the livestock we can arrange during that fall, winter or early spring. The cattle punch a lot of depressions in the ash, making places for seeds to establish. The stock are removed before appreciable growth begins in the spring, so very few of our plants will receive a second bite from a cow before the stock are moved. We make a special effort to get a good number of cattle in the pasture again in the fall to trample the abundant seed which sets the next several years after the burn. Grass plants which have been singed a bit seem to be really motivated to produce seed! Annual weeds are prominent, but rapidly begin to give way to the perennials.

So our watershed improvement program now has three phases – cut the juniper trees, wait a couple of years and then burn these trees and follow as soon as possible with livestock to let their hooves finish our work. Under this program we have increased ground cover by from 2 to 20 times; have seen raw gullies soften and heal; are still being surprised by springs appearing in unexpected places, and have perennial streams where we formerly saw only springtime flows. We're now producing trout for the first time in over 20 years.

Instead of the reduced grazing which was thought to be necessary 15 years ago, we are harvesting about 70% more forage than previously. And this livestock grazing is not the result of some compromise with the watershed program – *the livestock grazing is a vital part of our watershed improvement program.*

HRM Practitioners Cited

A number of HRM practitioners in New Mexico were recognized last Fall for the outstanding quality of their work. JERRY PARDUE, who ranches near Carlsbad, and BOB KNOX, who manages the UU Bar Ranch near Cimarron, won recognition as OUTSTANDING RANCHERS and SUSAN SAMUELSON, educator and New Mexico Branch board member, was named CONSERVATION TEACHER OF THE YEAR at the annual convention of New Mexico's Association of Soil and Water Conservation Districts.

WALT DAVENPORT, who ranches near Roswell, and BOB DUNLAP, who ranches near Magdalena, received EXCELLENCE IN GRAZING awards from the New Mexico Section of the Society for Range Management.

What's happening out there in other states? We'd like to know if this is a trend that's limited to the confines of New Mexico's borders, or if it extends beyond them.

—Champe Green

We're doing pretty much the same thing in the creek bottoms as we are in the uplands. We cut the juniper trees out of what we think should be the riparian zone and adjacent bottomland, burn this off a couple of years later and follow with good numbers of livestock on planned grazings. However there are some modifications here. First, we want to leave good grass/sedge growth in the riparian zone to filter sediments during spring runoff; and second, we aim to keep livestock out during July, August and September to avoid willow damage. So the best time to graze livestock is sometime during the months of February through June.

Out on the sagebrush-bunchgrass flats, everything's easier. We don't have to cut any trees down, and fire becomes more of an opportunity than a necessity. Our landscape description calls for a mosaic vegetation pattern containing varying densities of sagebrush and understory vegetation, with about 25% of the area producing dense bunchgrass with sparse sagebrush.

This 25% of the land which requires more grass and less brush to meet our goals is the area which we really concentrate on the livestock management. We plan the grazings (to minimize overgrazing) on the existing fencing, water and pasture arrangements that were there when we started. Since this is public land and is used by hunters, ORV riders, rockhounders, birdwatchers and many others, we can't expect to put in much more fencing. With relatively few pastures, our risk of overgrazing is greater, so we emphasize non-growing season use – fall, winter, early spring – when livestock can spend longer times in larger pastures without being attracted back to the first-grazed plants for that "second-bite-too-soon."

Our most powerful tool, here as elsewhere, is herd effect. But it's hard to come by: these modern Anguford-type buffalo are too tame to stampede properly. They will do a fine job of tromping for a short distance around a salt block or a water trough, but use of water or salt for applying herd effect requires pretty regular movement of the salt block (quite possible) or water trough (more difficult). By far our most successful application of herd effect has been achieved through feeding a marvelous protein supplement called "alfalfa hay." When alfalfa hay is fed amongst the sagebrush-bunchgrass, the sagebrush takes quite a beating, and the bunchgrass seizes the advantage. Proper feeding technique is to take the hay to the livestock, feeding in a slightly different area each day. Feeding too often in the same area will eliminate the sagebrush and our very best rangeland retains a moderate amount of sagebrush for nutrient cycling, snow retention, winter feed availability and wildlife habitat. Feeding day after day in the same area, of course, would eliminate even the bunchgrass, and worse yet, be a terrible waste of opportunity for real improvement.

We have a little Russian knapweed in the district, and one of the local ranchers has a patch growing in an old abandoned field which receives fairly heavy winter grazing use. The knapweed, which I have worried about for several years, is declining in density and perennial grasses – creeping wildrye, basin wildrye and Kentucky bluegrass – are making definite gains. The knapweed patch, with its mixture of knapweed and grasses, is attractive to cattle and is getting additional tromping and stomping which is quite apparent when viewed a few days after a snow storm. I think it quite possible that animal impact will help move the process of succession forward until the knapweed is only a minor component of the whole community.

So is it possible to return the rangelands of the Pacific Northwest to their pre-white-man "pristine" condition? Of course not. Those "pristine" communities of the past were produced by an almost total lack of animal impact. And stagnant, unproductive, lichen-dominated communities they must have been. So long as we have these big, platter-footed tromping, stomping ungulates (cows and horses) we won't see a return to conditions of the past. But we can do a *much better* job of management, both for our watersheds and for our riparian zones. We need to set goals which tell us what the landscape should look like. The goals should be high, because this land has higher capabilities than most of us yet realize.

CENTER FOR HRM THIRD ANNUAL MEETING

FEBRUARY 6-7, 1987 HILTON INN ALBUQUERQUE, NEW MEXICO

You've only got a few more days to register for our Annual Meeting, which promises to be our biggest and best ever. Please contact us immediately if you have not received your pre-registration packet. A limited number of late registrants will be admitted at the door but we cannot guarantee the availability of seats in the workshops.

Tentative Agenda

Friday, February 6th—Workshops

7:30-2:00	Registration
8:00-12:00	"Team Building" — Don Green facilitator
1:00-5:00	"Managing Your Time" — Troy Neal facilitator
1:00-7:00	Exhibition area open
6:00-8:00	Hospitality/Welcome

[illegible]urday, February 7th—Plenary Session

7:00-4:00	Registration
8:00-7:00	Exhibition area open
9:00-10:00	Business Meeting
10:00-10:20	"What We Accomplished in 1986," by Tommie Martin
10:30-10:45	Break
10:45-11:30	Branch Reports
11:30-12:00	"What We Hope to Accomplish in 1987," by Allan Savory
12:00-1:30	Lunch
1:30-2:15	"Innovative Marketing," by Doc & Connie Hatfield
2:15-3:00	"Regenerative Agriculture," by Robert Rodale
3:00-3:30	Break
3:30-5:00	Panel Discussion, "Getting Started and Getting Going"
5:00-7:00	Hospitality/HRM Giveaway Extravaganza drawings
7:00-9:00	Dinner (Guest Speaker: Troy Neal, "Champ or Chump — The Decision is Yours")

SOIL ANALYSIS

A TOOL FOR HIGHER QUALITY & QUANTITY

BY BOB CANTISANO

Perhaps a grower's biggest asset, yet one of the least understood factors in crop production, is the soil. Many years ago, when soils were fresh and vital and the return from the land was great, growers didn't need to know much about a soil to produce crops. A little manure, crop rotation and nature's abundance seemed to be all that was necessary. Today the situation has changed. Growers must become fully aware of their soils' capabilities and limitations in order to grow high quality and high yields at a profit. Soil analysis is a very handy tool for educating yourself about your soils and their ability to produce a crop.

Many growers have experience with using the small testing kits available from Sudbury, La Motte and others. While these kits do give rudimentary information on nitrogen, phosphorus, potassium and pH, I long ago discovered them to be inaccurate and misleading. They only test for *soluble* N, P & K, yet most soils have low levels of soluble nutrients. Thus, they tend to encourage the user to overfertilize with soluble forms of fertilizers, rather than to rely on the microbial population of the soil to convert nutrients into forms available to plants. Further, these color coded systems mislead the user into believing that they must obtain the "high" readings in order to grow a good crop. This is totally wrong and, in fact, counterproductive for some crops. Most crops can get by quite nicely with less than "high" readings. I feel these inexpensive kits are just sales tools for chemical fertilizers. Further, the pH readings are wrong better than 90% of the time, and even when correct, the pH test does not indicate which elements are causing the high or low pH, so people often apply the wrong pH correctors in the wrong amounts with lousy results! I believe all of these soil test kits should be thrown into the garbage (but I suspect they probably qualify as toxic waste – so what do you do?)

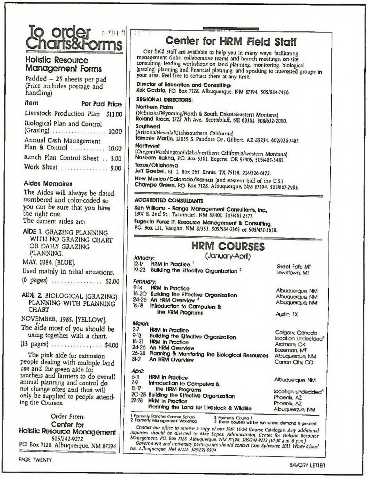
A much better method, with greater degree of accuracy and understanding, is obtained by sending soils to a professional laboratory which tests soils regularly. I must emphasize regularly, because many labs do soil work as a sideline and don't have the proper techniques, equipment or experience to help growers.

What should you look for in a soil test lab? At a bare minimum, the laboratory should provide readouts and *natural* fertilization recommendations on organic matter; humus; nitrate and ammonia nitrogen; available and reserve phosphorus; exchangeable calcium, magnesium, potassium and sodium, soil and buffer pH, cation exchange capacity, % of base saturation, hydrogen, sulfur, zinc, free calcium, soluble salts and biologically available nitrogen. If all of these terms confuse you, the lab or consultant should explain them fully so you can understand their importance and what you can do about changing them, if necessary. This type of analysis can give the grower excellent information and direction for up to 3 years from one test.

A very thorough analysis will also include readouts and recommendations on manganese, iron, copper, boron, selenium, soil ergs, chlorine, nitrite, brix, carbon as well as general vitality and minor elements. We are finding that these areas are as important to overall plant health and vitality as the more commonly tested elements. Your lab should ask you for very specific information about past cultural and fertilization practices, noticeable problems, crops to be grown, yield goals, past cover or legume crops, source and method of irrigation. This information gives the lab the background necessary to really help you.

What can you do with all this information you receive? You will be able to plan an appropriate soil amendment and fertilization program for 1-3 years using cost effective methods with the right amount of the right materials for your crop on your soil. You will stop wasting money and time on the wrong fertilizers or too much of a good thing. The quality, vitality and productivity of your crops will increase dramatically.

Bob Cantisano operates Peaceful Valley Farm Supply in Nevada City, California, supplying products and consulting services for "biological" farmers and gardeners. This article first appeared in The Permaculture Activist, *Summer 1986.*



To order Charts&Forms

Holistic Resource Management Forms

Padded – 25 sheets per pad
(Price includes postage and handling)

Item	Per Pad Price
Livestock Production Plan	$11.00
Biological Plan and Control (Grazing)	10.00
Annual Cash Management Plan & Control	10.00
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Aides Memoires

The Aides will always be dated, numbered and color-coded so you can be sure that you have the right one.
The current aides are:

AIDE 1. GRAZING PLANNING WITH NO GRAZING CHART OR DAILY GRAZING PLANNING.

MAY, 1984, [BLUE].

Used mainly in tribal situations.

(6 pages) $2.00

AIDE 2. BIOLOGICAL (GRAZING) PLANNING WITH PLANNING CHART

NOVEMBER, 1985, [YELLOW].

The aide most of you should be using together with a chart.

(13 pages) $4.00

The pink aide for extension people dealing with multiple land use and the green aide for ranchers and farmers to do overall annual planning and control do not change often and thus will only be supplied to people attending the Courses.

Order From:
Center for
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P.O. Box 7128, Albuquerque, NM 87194

Center for HRM Field Staff

Our field staff are available to help you in many ways: facilitating management clubs, collaborative teams and branch meetings; on-site consulting; leading workshops on land planning, monitoring, biological (grazing) planning and financial planning; and speaking to interested groups in your area. Feel free to contact them at any time.

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ACCREDITED CONSULTANTS

Ken Williams – Range Management Consultants, Inc.,
1307 S. 2nd St., Tucumcari, NM 88401, 505/461-2577.

Eugenio Perez III, Resource Management & Consulting,
P.O. Box 121, Vaughn, NM 87353, 505/584-2363 or 505/472-3638.

HRM COURSES
(January-April)

January:		
12-17	HRM in Practice [1]	Great Falls, MT
19-23	Building the Effective Organization [2]	Lewistown, MT
February:		
9-14	HRM in Practice	Albuquerque, NM
16-20	Building the Effective Organization	Albuquerque, NM
24-26	An HRM Overview [3]	Albuquerque, NM
16-18	Introduction to Computers & the HRM Programs	Austin, TX
March:		
2-7	HRM in Practice	Calgary, Canada
9-13	Building the Effective Organization	location undecided[4]
16-21	HRM in Practice	Ardmore, OK
24-26	An HRM Overview	Bozeman, MT
26-28	Planning & Monitoring the Biological Resources	Albuquerque, NM
31-2	An HRM Overview	Canon City, CO
April:		
6-11	HRM in Practice	Albuquerque, NM
7-9	Introduction to Computers & the HRM Programs	location undecided[4]
13-17	Building the Effective Organization	Phoenix, AZ
20-25	HRM in Practice	Phoenix, AZ
27-28	Planning the Land for Livestock & Wildlife	Albuquerque, NM

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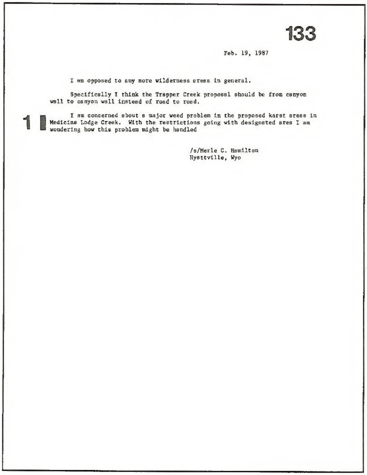
[1] Formerly Rancher/Farmer School
[2] Formerly Management Workshop
[3] Formerly Course 1
[4] These courses will be run where demand is greatest

Contact our office to receive a copy of our 1987 HRM Course Catalogue. *Any additional inquiries should be directed to Mae Lopez, Administrator, Center for Holistic Resource Management, P.O. Box 7128, Albuquerque, NM 87194; 505/242-9272 (10:30 a.m.-6 p.m.)*

Government and university participants should contact Don Sylvester, 2013 White Cloud NE, Albuquerque, NM 87112; 505/291-0504.

PAGE TWENTY

SAVORY LETTER



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Feb. 19, 1987

I am opposed to any more wilderness areas in general.

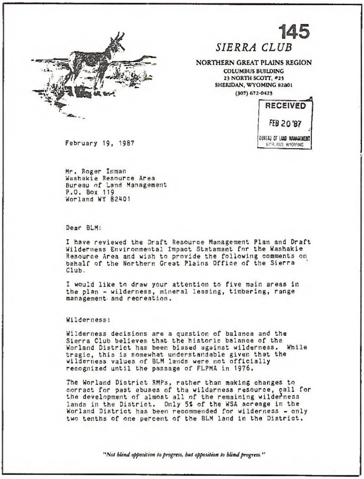
Specifically I think the Trapper Creek proposal should be from canyon wall to canyon wall instead of road to road.

1 I am concerned about a major weed problem in the proposed karst areas in Medicine Lodge Creek. With the restrictions going with designated area I am wondering how this problem might be handled

/s/Merle C. Hamilton
Hyattville, Wyo

Response to Letter 133

133-1 Refer to response 11-1.



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RECEIVED
FEB 20 '87
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

February 19, 1987

Mr. Roger Inman
Washakie Resource Area
Bureau of Land Management
P.O. Box 119
Worland WY 82401

Dear BLM:

I have reviewed the Draft Resource Management Plan and Draft Wilderness Environmental Impact Statement for the Washakie Resource Area and wish to provide the following comments on behalf of the Northern Great Plains Office of the Sierra Club.

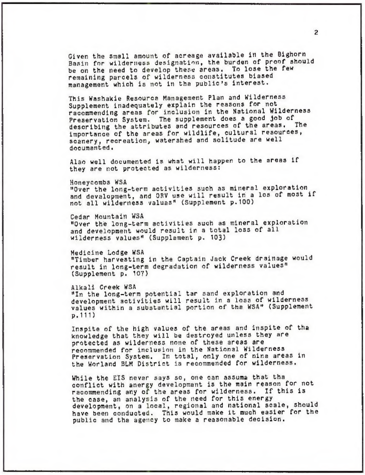
I would like to draw your attention to five main areas in the plan - wilderness, mineral leasing, timbering, range management and recreation.

Wilderness:

Wilderness decisions are a question of balance and the Sierra Club believes that the historic balance of the Worland District has been biased against wilderness. While tragic, this is somewhat understandable given that the wilderness values of BLM lands were not officially recognized until the passage of FLPMA in 1976.

The Worland District RMPs, rather than making changes to correct for past abuses of the wilderness resource, call for the development of almost all of the remaining wilderness lands in the District. Only 5% of the WSA acreage in the Worland District has been recommended for wilderness - only two tenths of one percent of the BLM land in the District.

"Not blind opposition to progress, but opposition to blind progress."



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Given the small amount of acreage available in the Bighorn Basin for wilderness designation, the burden of proof should be on the need to develop these areas. To lose the few remaining parcels of wilderness constitutes biased management which is not in the public's interest.

This Washakie Resource Management Plan and Wilderness Supplement inadequately explain the reasons for not recommending areas for inclusion in the National Wilderness Preservation System. The supplement does a good job of describing the attributes and resources of the areas. The importance of the areas for wildlife, cultural resources, scenery, recreation, watershed and solitude are well documented.

Also well documented is what will happen to the areas if they are not protected as wilderness:

Honeycombs WSA
"Over the long-term activities such as mineral exploration and development, and ORV use will result in a los of most if not all wilderness values" (Supplement p.100)

Cedar Mountain WSA
"Over the long-term activities such as mineral exploration and development would result in a total loss of all wilderness values" (Supplement p. 103)

Medicine Lodge WSA
"Timber harvesting in the Captain Jack Creek drainage would result in long-term degradation of wilderness values" (Supplement p. 107)

Alkali Creek WSA
"In the long-term potential tar sand exploration and development activities will result in a loss of wilderness values within a substantial portion of the WSA" (Supplement p.111)

Inspite of the high values of the areas and inspite of the knowledge that they will be destroyed unless they are protected as wilderness none of these areas are recommended for inclusion in the National Wilderness Preservation System. In total, only one of nine areas in the Worland BLM District is recommended for wilderness.

While the EIS never says so, one can assume that the conflict with energy development is the main reason for not recommending any of the areas for wilderness. If this is the case, an analysis of the need for this energy development, on a local, regional and national scale, should have been conducted. This would make it much easier for the public and the agency to make a reasonable decision.

Response to Letter 145

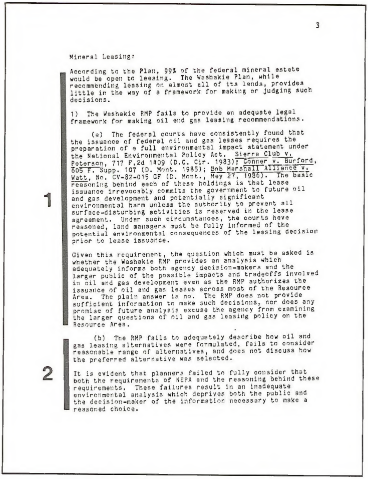
145-1 Much of the development of alternatives and analysis of impacts related to oil and gas leasing was predicated on the Washakie Oil and Gas Environmental Assessment (EA) written in 1980, which is a detailed programmatic environmental assessment of oil and gas leasing. The determination was made through that document ". . . to continue the leasing, exploration and development of Federally owned oil and gas resources in the Washakie Resource Area." A "no leasing" alternative was also analyzed in the EA, which considered issuing no leases, resulting in the eventual (very long-term) elimination of oil and gas activities in the resource area.

145-2 During scoping and issue identification for the RMP/EIS, it was determined that the decision reached in the Oil and Gas EA was still valid and would be carried through the RMP development process. On that basis, alternatives were developed for the RMP/EIS. One resulting constraint on alternative development was, generally, that the amount of acreage currently leased would be the minimum acreage leased and since nearly 99 percent of the resource area was already under lease, that would also be the maximum acreage leased.

Given the current leased area as the basis for any alternative, we developed a range of alternatives which addressed various levels of restrictions on oil and gas activities, including "no surface occupancy." These restrictions were developed to mitigate predicted impacts to surface resource values (e.g., wildlife management and recreation management). See response 16-5.

Once the impact analyses of the various alternatives was completed, BLM managers chose the alternative that best satisfied the many varied demands for use of the public lands. Among the factors considered in choosing the Preferred Alternative are those categorized as environmental, social, political and economic. Another factor that is considered before making the final decision is the public input, if any, on the oil and gas leasing questions.

145-3 Under the multiple-use mandate of FLPMA, all uses of public lands are to be considered and accommodated, unless one use presents a severe and unmitigable impact to other significant values. The Washakie Oil and Gas EA did not show that the majority of the resource area possesses such important and sensitive surface values that properly managed oil and gas development cannot be a compatible land use. Oil and gas development is a traditional land use in the



Mineral Leasing:

1 According to the Plan, 99% of the federal mineral estate would be open to leasing. The Washakie Plan, while recommending leasing on almost all of its lands, provides little in the way of a framework for making or judging such decisions.

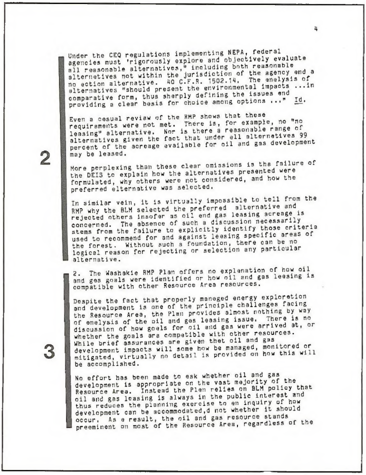
1) The Washakie RMP fails to provide an adequate legal framework for making oil and gas leasing recommendations.

(a) The federal courts have consistently found that the issuance of federal oil and gas leases requires the preparation of a full environmental impact statement under the National Environmental Policy Act. Sierra Club v. Peterson, 717 F.2d 1409 (D.C. Cir. 1983); Conner v. Burford, 605 F. Supp. 107 (D. Mont. 1985); Bob Marshall Alliance v. Watt, No. CV-82-015 GF (D. Mont., May 27, 1986). The basic reasoning behind each of these holdings is that lease issuance irrevocably commits the government to future oil and gas development and potentially significant environmental harm unless the authority to prevent all surface-disturbing activities is reserved in the lease agreement. Under such circumstances, the courts have reasoned, land managers must be fully informed of the potential environmental consequences of the leasing decision prior to lease issuance.

Given this requirement, the question which must be asked is whether the Washakie RMP provides an analysis which adequately informs both agency decision-makers and the larger public of the possible impacts and tradeoffs involved in oil and gas development even as the RMP authorizes the issuance of oil and gas leases across most of the Resource Area. The plain answer is no. The RMP does not provide sufficient information to make such decisions, nor does any promise of future analysis excuse the agency from examining the larger questions of oil and gas leasing policy on the Resource Area.

2 (b) The RMP fails to adequately describe how oil and gas leasing alternatives were formulated, fails to consider reasonable range of alternatives, and does not discuss how the preferred alternative was selected.

It is evident that planners failed to fully consider that both the requirements of NEPA and the reasoning behind these requirements. These failures result in an inadequate environmental analysis which deprives both the public and the decision-maker of the information necessary to make a reasoned choice.



2 Under the CEQ regulations implementing NEPA, federal agencies must 'rigorously explore and objectively evaluate all reasonable alternatives," including both reasonable alternatives not within the jurisdiction of the agency and a no action alternative. 40 C.F.R. 1502.14. The analysis of alternatives "should present the environmental impacts ...in comparative form, thus sharply defining the issues and providing a clear basis for choice among options ..." Id.

Even a casual review of the RMP shows that these requirements were not met. There is, for example, no "no leasing" alternative. Nor is there a reasonable range of alternatives given the fact that under all alternatives 99 percent of the acreage available for oil and gas development may be leased.

More perplexing than these clear omissions is the failure of the DEIS to explain how the alternatives presented were formulated, why others were not considered, and how the preferred alternative was selected.

In similar vein, it is virtually impossible to tell from the RMP why the BLM selected the preferred alternative and rejected others insofar as oil and gas leasing acreage is concerned. The absence of such a discussion necessarily stems from the failure to explicitly identify those criteria used to recommend for and against leasing specific areas of the forest. Without such a foundation, there can be no logical reason for rejecting or selection any particular alternative.

3 2. The Washakie RMP Plan offers no explanation of how oil and gas goals were identified or how oil and gas leasing is compatible with other Resource Area resources.

Despite the fact that properly managed energy exploration and development is one of the principle challenges facing the Resource Area, the Plan provides almost nothing by way of analysis of the oil and gas leasing issue. There is no discussion of how goals for oil and gas were arrived at, or whether the goals are compatible with other resources. While brief assurances are given that oil and gas development impacts will some how be managed, monitored or mitigated, virtually no detail is provided on how this will be accomplished.

No effort has been made to ask whether oil and gas development is appropriate on the vast majority of the Resource Area. Instead the Plan relies on BLM policy that oil and gas leasing is always in the public interest and thus reduces the planning exercise to an inquiry of how development can be accommodated,d not whether it should occur. As a result, the oil and gas resource stands preeminent on most of the Resource Area, regardless of the

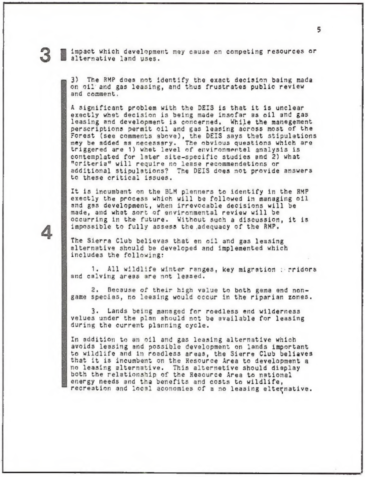
resource area. We are aware, however, that oil and gas development is not necessarily an appropriate land use throughout the resource area. Thus, various levels of restrictions or total exclusions on certain high value areas are considered in the alternatives.

145-4 In the description of the alternatives, we have modified the wording to indicate that additional restrictions could be applied to mitigate the impacts of proposed exploration and development activities, when requests for approvals are submitted, such as an Application for Permit to Drill or a Sundry Notice. We do not envision developing additional restrictions on a case-by-case basis to be applied to leases prior to issuance and will rely on the standard stipulations (see the revised Appendix A) and standard lease form stipulations now in use. An environmental analysis of each proposed action is completed and mitigations are developed through the EA process.

As a result of these comments and similar concerns raised by BLM specialists, we have included the summary of an analysis of the impacts of not leasing certain high value lands and of employing "no leasing" planning area-wide. Those summaries are found in Appendix M in this document.

145-5 The benefits of harvesting timber under the Preferred Alternative and the proposed increase in harvest levels are related to wildlife habitat and watershed improvement. The current condition of the forest, which is more than 80 percent overmature timber, is not the optimum condition for wildlife habitat. We have attempted to clarify our intention regarding timber harvesting and wildlife habitat in the descriptions of the alternatives. Also, see responses 106-3 and 168-3.

145-6 The Preferred Alternative indicates that an average of three AMPs would be started or revised each year. These activity plans are the basic vehicle to implement intensive range management on public lands. Current Bureau policy is to gather adequate data on all "I" and "M" category allotments through monitoring, to determine the effects of management actions on the rangeland resources and to provide quantifiable data needed to support management decisions. According to this policy decisions should be issued or agreements entered into within 5 years of publication of the Record of Decision and the Range Program Summary. The improvement of range condition is highly dependent on the changes in grazing management implemented through these agreements and decisions. The revised



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3 impact which development may cause on competing resources or alternative land uses.

4 3) The RMP does not identify the exact decision being made on oil and gas leasing, and thus frustrates public review and comment.

A significant problem with the DEIS is that it is unclear exactly what decision is being made insofar as oil and gas leasing and development is concerned. While the management perscriptions permit oil and gas leasing across most of the Forest (see comments above), the DEIS says that stipulations may be added as necessary. The obvious questions which are triggered are 1) what level of environmental analysis is contemplated for later site-specific studies and 2) what "criteria" will require no lease recommendations or additional stipulations? The DEIS does not provide answers to these critical issues.

It is incumbent on the BLM planners to identify in the RMP exactly the process which will be followed in managing oil and gas development, when irrevocable decisions will be made, and what sort of environmental review will be occurring in the future. Without such a discussion, it is impossible to fully assess the adequacy of the RMP.

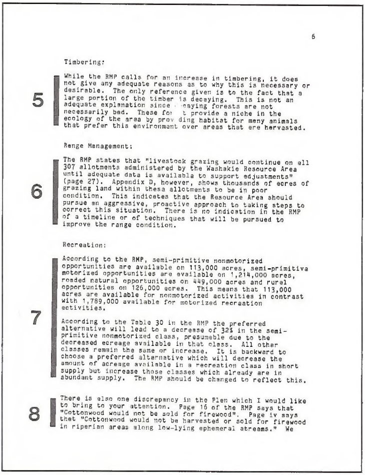
The Sierra Club believes that an oil and gas leasing alternative should be developed and implemented which includes the following:

1. All wildlife winter ranges, key migration corridors and calving areas are not leased.

2. Because of their high value to both game and non-game species, no leasing would occur in the riparian zones.

3. Lands being managed for roadless and wilderness values under the plan should not be available for leasing during the current planning cycle.

In addition to an oil and gas leasing alternative which avoids leasing and possible development on lands important to wildlife and in roadless areas, the Sierra Club believes that it is incumbent on the Resource Area to development a no leasing alternative. This alternative should display both the relationship of the Resource Area to national energy needs and the benefits and costs to wildlife, recreation and local economies of a no leasing alternative.



6

Timbering:

5 While the RMP calls for an increase in timbering, it does not give any adequate reasons as to why this is necessary or desirable. The only reference given is to the fact that a large portion of the timber is decaying. This is not an adequate explanation since decaying forests are not necessarily bad. These forests provide a niche in the ecology of the area by providing habitat for many animals that prefer this environment over areas that are harvested.

Range Management:

6 The RMP states that "livestock grazing would continue on all 307 allotments administered by the Washakie Resource Area until adequate data is available to support adjustments" (page 27). Appendix D, however, shows thousands of acres of grazing land within these allotments to be in poor condition. This indicates that the Resource Area should pursue an aggressive, proactive approach to taking steps to correct this situation. There is no indication in the RMP of a timeline or of techniques that will be pursued to improve the range condition.

Recreation:

7 According to the RMP, semi-primitive nonmotorized opportunities are available on 113,000 acres, semi-primitive motorized opportunities are available on 1,214,000 acres, roaded natural opportunities on 449,000 acres and rural opportunities on 126,000 acres. This means that 113,000 acres are available for nonmotorized activities in contrast with 1,789,000 available for motorized recreation activities.

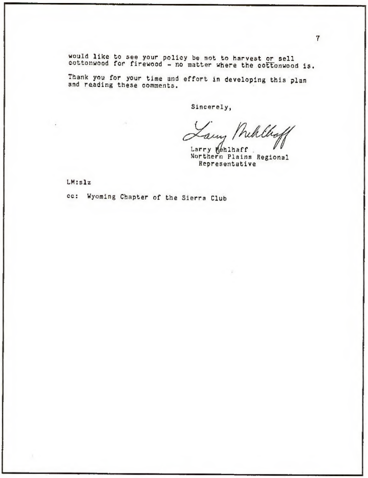
According to the Table 30 in the RMP the preferred alternative will lead to a decrease of 32% in the semi-primitive nonmotorized class, presumable due to the decreased acreage available in that class. All other classes remain the same or increase. It is backward to choose a preferred alternative which will decrease the amount of acreage available in a recreation class in short supply but increase those classes which already are in abundant supply. The RMP should be changed to reflect this.

8 There is also one discrepancy in the Plan which I would like to bring to your attention. Page 16 of the RMP says that "Cottonwood would not be sold for firewood". Page iv says that "Cottonwood would not be harvested or sold for firewood in riparian areas along low-lying ephemeral streams." We

Appendix E describes common problems in the grazing management program and the management actions needed to correct those problems. Refer also to response 165-2.

145-7 The predicted decrease in the semi-primitive nonmotorized (SPNM) recreation opportunity spectrum class would be caused by the various multiple-use activities, including recreation, that occur on public lands. The potential loss of SPNM recreation opportunities must be weighed by managers against the benefits to be derived from activities authorized in those areas.

145-8 We have modified the text so that the statements on pages iv and 16 of the Draft RMP/EIS are consistent.



7

would like to see your policy be not to harvest or sell cottonwood for firewood - no matter where the cottonwood is.

Thank you for your time and effort in developing this plan and reading these comments.

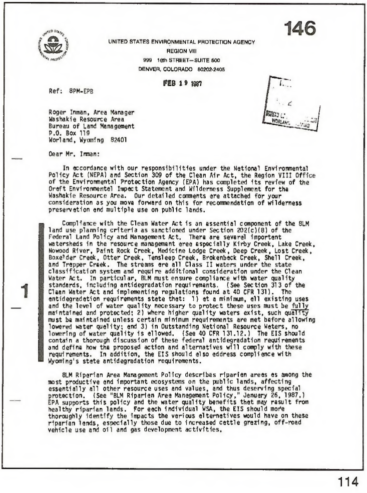
Sincerely,

Larry Mehlhaff

Larry Mehlhaff
Northern Plains Regional
Representative

LM:slz

cc: Wyoming Chapter of the Sierra Club



146

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
999 18th STREET—SUITE 500
DENVER, COLORADO 80202-2405

FEB 19 1987

Ref: 8PM-EPB

Roger Inman, Area Manager
Washakie Resource Area
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Inman:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Region VIII Office of the Environmental Protection Agency (EPA) has completed its review of the Draft Environmental Impact Statement and Wilderness Supplement for the Washakie Resource Area. Our detailed comments are attached for your consideration as you move forward on this for recommendation of wilderness preservation and multiple use on public lands.

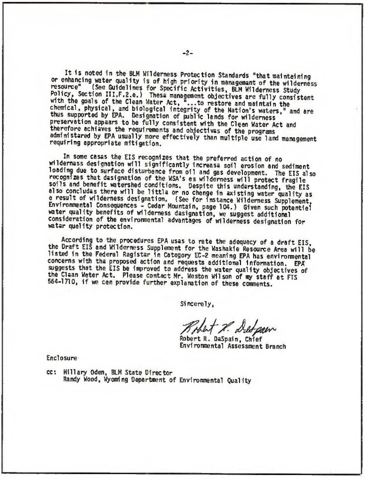
1 Compliance with the Clean Water Act is an essential component of the BLM land use planning criteria as sanctioned under Section 202(c)(8) of the Federal Land Policy and Management Act. There are several important watersheds in the resource management area especially Kirby Creek, Lake Creek, Nowood River, Paint Rock Creek, Medicine Lodge Creek, Deep Creek, Lost Creek, Boxelder Creek, Otter Creek, Tensleep Creek, Brokenback Creek, Shell Creek, and Trapper Creek. The streams are all Class II waters under the state classification system and require additional consideration under the Clean Water Act. In particular, BLM must ensure compliance with water quality standards, including antidegradation requirements. (See Section 313 of the Clean Water Act and implementing regulations found at 40 CFR 131). The antidegradation requirements state that: 1) at a minimum, all existing uses and the level of water quality necessary to protect these uses must be fully maintained and protected; 2) where higher quality waters exist, such quality must be maintained unless certain minimum requirements are met before allowing lowered water quality; and 3) in Outstanding National Resource Waters, no lowering of water quality is allowed. (See 40 CFR 131.12.) The EIS should contain a thorough discussion of these federal antidegradation requirements and define how the proposed action and alternatives will comply with these requirements. In addition, the EIS should also address compliance with Wyoming's state antidegradation requirements.

BLM Riparian Area Management Policy describes riparian areas as among the most productive and important ecosystems on the public lands, affecting essentially all other resource uses and values, and thus deserving special protection. (See "BLM Riparian Area Management Policy," January 26, 1987.) EPA supports this policy and the water quality benefits that may result from healthy riparian lands. For each individual WSA, the EIS should more thoroughly identify the impacts the various alternatives would have on these riparian lands, especially those due to increased cattle grazing, off-road vehicle use and oil and gas development activities.

Response to Letter 146

146-1 Water produced in oil and gas fields is the primary point source of potential water quality degradation on public lands. With the exception of the surface discharge of produced water on or from federal leases, the BLM authorizes such disposals under Notice to Lessees and Operators of Federal and Indian Oil and Gas Leases (NTL-2B), pursuant to existing laws and regulations. Compliance with the Clean Water Act is, of course, an important consideration in authorizing disposals.

When the surface discharge of produced water is proposed, such as to the drainages listed in the comment, a State of Wyoming National Pollutant Discharge Elimination System (NPDES) permit must be granted before the BLM will authorize discharge under the NTL2B permit. Since Wyoming anti-degradation requirements pertain only to Class I waters, the granting of NPDES and NTL2B permits may result in some degradation of Class II waters. That degradation is acceptable under current State of Wyoming Water Quality Regulations. A further point of clarification: there currently are no Outstanding National Resource Waters within the planning area boundaries.



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It is noted in the BLM Wilderness Protection Standards "that maintaining or enhancing water quality is of high priority in management of the wilderness resource" (See Guidelines for Specific Activities, BLM Wilderness Study Policy, Section III.F.2.e.) These management objectives are fully consistent with the goals of the Clean Water Act, "...to restore and maintain the chemical, physical, and biological integrity of the Nation's waters," and are thus supported by EPA. Designation of public lands for wilderness preservation appears to be fully consistent with the Clean Water Act and therefore achieves the requirements and objectives of the programs administered by EPA usually more effectively than multiple use land management requiring appropriate mitigation.

In some cases the EIS recognizes that the preferred action of no wilderness designation will significantly increase soil erosion and sediment loading due to surface disturbance from oil and gas development. The EIS also recognizes that designation of the WSA's as wilderness will protect fragile soils and benefit watershed conditions. Despite this understanding, the EIS also concludes there will be little or no change in existing water quality as a result of wilderness designation. (See for instance Wilderness Supplement, Environmental Consequences - Cedar Mountain, page 104.) Given such potential water quality benefits of wilderness designation, we suggest additional consideration of the environmental advantages of wilderness designation for water quality protection.

According to the procedures EPA uses to rate the adequacy of a draft EIS, the Draft EIS and Wilderness Supplement for the Washakie Resource Area will be listed in the Federal Register in Category EC-2 meaning EPA has environmental concerns with the proposed action and requests additional information. EPA suggests that the EIS be improved to address the water quality objectives of the Clean Water Act. Please contact Mr. Weston Wilson of my staff at FTS 564-1710, if we can provide further explanation of these comments.

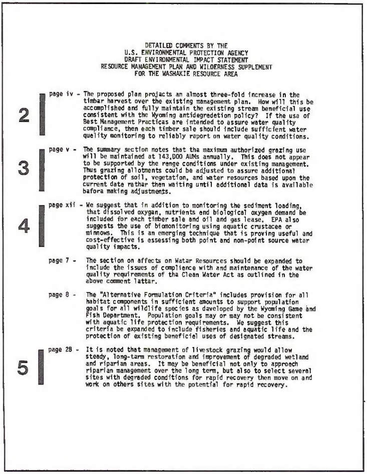
Sincerely,

Robert R. DaSpain

Robert R. DaSpain, Chief
Environmental Assessment Branch

Enclosure

cc: Hillary Oden, BLM State Director
Randy Wood, Wyoming Department of Environmental Quality



DETAILED COMMENTS BY THE
U.S. ENVIRONMENTAL PROTECTION AGENCY
DRAFT ENVIRONMENTAL IMPACT STATEMENT
RESOURCE MANAGEMENT PLAN AND WILDERNESS SUPPLEMENT
FOR THE WASHAKIE RESOURCE AREA

2 page iv - The proposed plan projects an almost three-fold increase in the timber harvest over the existing management plan. How will this be accomplished and fully maintain the existing stream beneficial use consistent with the Wyoming antidegradation policy? If the use of Best Management Practices are intended to assure water quality compliance, then each timber sale should include sufficient water quality monitoring to reliably report on water quality conditions.

3 page v - The summary section notes that the maximum authorized grazing use will be maintained at 143,000 AUMs annually. This does not appear to be supported by the range conditions under existing management. Thus grazing allotments could be adjusted to assure additional protection of soil, vegetation, and water resources based upon the current data rather than waiting until additional data is available before making adjustments.

4 page xii - We suggest that in addition to monitoring the sediment loading, that dissolved oxygen, nutrients and biological oxygen demand be included for each timber sale and oil and gas lease. EPA also suggests the use of biomonitoring using aquatic crustacea or minnows. This is an emerging technique that is proving useful and cost-effective is assessing both point and non-point source water quality impacts.

page 7 - The section on affects on Water Resources should be expanded to include the issues of compliance with and maintenance of the water quality requirements of the Clean Water Act as outlined in the above comment letter.

page 8 - The "Alternative Formulation Criteria" includes provision for all habitat components in sufficient amounts to support population goals for all wildlife species as developed by the Wyoming Game and Fish Department. Population goals may or may not be consistent with aquatic life protection requirements. We suggest this criteria be expanded to include fisheries and aquatic life and the protection of existing beneficial uses of designated streams.

5 page 28 - It is noted that management of livestock grazing would allow steady, long-term restoration and improvement of degraded wetland and riparian areas. It may be beneficial not only to approach riparian management over the long term, but also to select several sites with degraded conditions for rapid recovery then move on and work on others sites with the potential for rapid recovery.

The most serious and widespread degradation of water quality in streams in the Bighorn Basin results from sediment, according to the Bighorn Basin 208 Water Quality Management Plan. While we are aware that non-point source pollutants can and may include other constituents, we have concentrated on sediments in the RMP/EIS. The impacts predicted for each alternative show that a long-term reduction in sediment loading in the Bighorn River and its tributaries will result from the prescriptions proposed. We feel the RMP/EIS does show a commitment to preserving water quality and to meeting federal and state anti-degradation requirements.

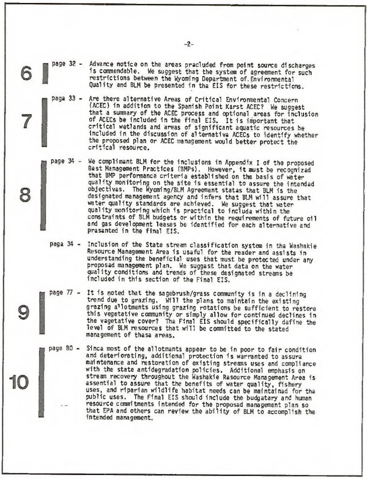
146-2 The timber harvest level proposed in the Preferred Alternative does not necessarily represent a three-fold increase in timber harvest over current levels. Rather, it sets an upper limit on harvest and relates harvest to meeting goals or providing benefits for other resource management programs. Mitigations developed for specific timber sales through the environmental assessment process would be used to maintain existing stream beneficial uses. Budgetary constraints limit the capability to incorporate water quality monitoring on all timber sales.

146-3 In accordance with current BLM policy, adjustments to this level of use will be made when acceptable supporting data become available. In the Washakie Resource Area, monitoring data will be collected in addition to baseline data, to support any adjustments.

146-4 We do not object to the use of the suggested monitoring program in certain situations. However, we feel this type of monitoring by BLM alone is not feasible on the scale recommended in the comment. The responsibility would have to be shared by the holders of timber sale contracts or oil and gas leases.

146-5 The statement about allowing steady, long-term restoration and improvement of degraded wetland/riparian areas applies to the entire resource area. We plan to achieve short-term, rapid recovery in many areas when major changes are made in grazing treatments and when degraded areas are fenced to exclude livestock while recovery occurs.

146-6 We are not aware of any agreement between the DEQ and the BLM for advance notification. If such an agreement is necessary, we will work with the DEQ to develop a more formal avenue of communications for informing them of such restrictions.



-2-

6 page 32 - Advance notice on the areas pracluded from point source discharges is commendable. We suggest that the system of agreement for such restrictions between the Wyoming Department of. Environmental Quality and BLM be presented in tha EIS for these restrictions.

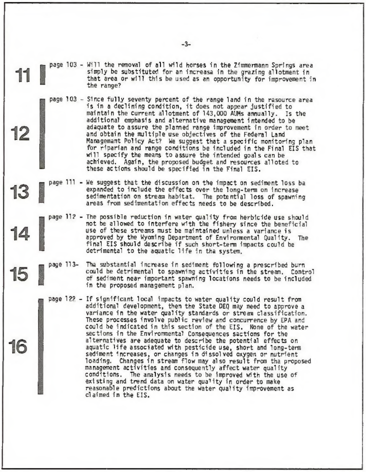
7 paga 33 - Are there alternative Areas of Critical Environmental Concern (ACEC) in addition to the Spanish Point Karst ACEC? We suggest that a summary of the ACEC process and optional areas for inclusion of ACECs be included in the final EIS. It is important that critical wetlands and areas of significant aquatic resources be included in the discussion of alternativa ACECs to identify whether the proposed plan or ACEC management would better protect the critical resource.

8 page 34 - We complimant BLM for the inclusions in Appendix I of the proposed Bast Management Practices (BMPs). However, it must be recognizad that BMP performanca criteria established on the basis of water quality monitoring on the site is essential to assure the intendad objectivas. The Wyoming/BLM Agreement statas that BLM is the designated management agency and infers that BLM will assure that water quality standards are achieved. We suggest that water quality monitoring which is practical to includa within the constraints of BLM budgets or within the requirements of future oil and gas development leases be identified for each alternative and prasanted in the final EIS.

paga 34 - Inclusion of the State stream classification system in tha Washakie Resource Management Area is usaful for the reader and assists in understanding the beneficial uses that must be protected under any proposad management plan. We suggast that data on the water quality conditions and trends of these designated streams be included in this section of the Final EIS.

9 page 77 - It is noted that the sagebrush/grass community is in a declining trend due to grazing. Will the plans to maintain the existing grazing allotments using grazing rotations be sufficient to restore this vegetative community or simply allow for continued declines in the vagetative cover? Tha Final EIS should specifically dafine the level of BLM resources that will be committed to the stated management of thasa areas.

10 page 80 - Sinca most of the allotmants appear to be in poor to fair condition and deteriorating, additional protection is warranted to assura maintenance and restoration of existing streams uses and compliance with the state antidegradation policies. Additional emphasis on stream recovery throughout the Washakie Rasource Management Area is assential to assure that the benefits of water quality, fishery uses, and riparian wildlife habitat needs can be maintainad for tha public uses. The Final EIS should include the budgatary and human resource commitments intended for the proposad management plan so that EPA and others can review the ability of BLM to accomplish the intended management.



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11 page 103 - Will the removal of all wild horses in the Zimmermann Springs area simply be substituted for an increasa in the grazing allotment in that area or will this be used as an opportunity for improvement in the range?

12 page 103 - Since fully seventy percent of the range land in the rasource area is in a declining condition, it does not appear justified to maintain the current allotment of 143,000 AUMs annually. Is the additional emphasis and alternative management intended to be adaquate to assure the planned range improvement in order to meet and obtain the multiple use objectives of the Federal Land Managemant Policy Act? We suggest that a specific monitoring plan for riparian and range conditions be included in the Final EIS that will specify the means to assure the intended goals can be achieved. Again, the proposed budget and resources alloted to these actions should be specified in the Final EIS.

13 page 111 - We suggest that the discussion on the impact on sediment loss ba expanded to include the effects over the long-term on increase sedimentation on stream habitat. The potential loss of spawning areas from sedimentation effects needs to be described.

14 page 112 - The possible reduction in water quality from herbicide use should not be allowed to interfere with the fishery since the beneficial use of these streams must be maintained unless a variance is approved by the Wyoming Department of Environmental Quality. The final EIS should describe if such short-term impacts could be detrimental to the aquatic life in tha system.

15 page 113- Tha substantial increase in sediment following a prescribed burn could be detrimental to spawning activities in the stream. Control of sediment near important spawning locations needs to be included in the proposed management plan.

16 page 122 - If significant local impacts to water quality could result from additional development, then the State DEQ may need to approve a variance in the water quality standards or stream classification. These processes involve public review and concurrence by EPA and could be indicated in this section of the EIS. None of the water sections in the Environmental Consequences sactions for the alternatives are adequate to describe the potential effects on aquatic life associated with pesticide use, short and long-term sediment increases, or changes in dissolved oxygen or nutrient loading. Changes in stream flow may also result from tha proposed management activities and consequently affect water quality conditions. The analysis needs to be improved with the use of existing and trend data on water quality in order to make reasonable predictions about the water quality improvement as claimed in the EIS.

146-7 No other areas deemed suitable for ACEC designation were identified during scoping. We feel that wetlands can be adequately managed without an ACEC designation within the framework of the Preferred Alternative. The ACEC identification and designation process is described in Bureau Manual 1617.

146-8 The determination of levels and locations of water monitoring efforts is an appropriate consideration during the development of activity plans.

146-9 Table E-1 in Appendix E of the Draft RMP/EIS addresses the questions raised in this comment. If changes in grazing management alone are not adequate to improve these sites, treatments such as mechanical control, prescribed fire, and/or seeding would be considered. The specific identification of monetary and manpower needs for livestock grazing management is an activity plan consideration.

146-10 Our Preferred Alternative provides the framework for the restoration of stream zones to provide benefits associated with healthy stream ecosystems. Funding will be sought to implement projects and land management practices to restore degraded stream zones. However, the RMP/EIS is not the vehicle for identifying budgetary and personnel commitments of the Preferred Alternative.

146-11 No AUMs are allocated to wild horses. Any livestock use proposed following removal of the horses would be limited to current authorized use. If use still exceeds the level that would allow improvement of range condition, adjustments would be made in livestock use.

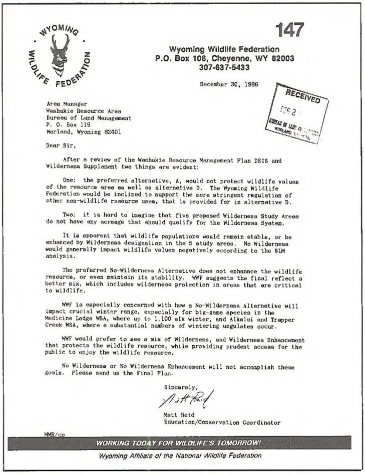
146-12 The sagebrush/grass vegetative community composes 70 percent of the resource area. Not all of that community is in a declining trend (see page 77 of the Draft RMP/EIS). A monitoring plan for the resource area will be developed after the Washakie RMP becomes final. The current BLM policy is that at least 20 percent of the rangeland budget would be used to monitor the effectiveness of range management actions.

146-13 A discussion of the impacts of sedimentation on stream habitat is found on page 201 of the Draft RMP/EIS and the impact of sedimentation on fish is discussed on page 116. Most streams in the resource area are located in steep canyons on the west slope of the Bighorn Mountains. As a result of flushing flows and reduced rates of erosion, sedimentation has not been the limiting factor controlling fisheries production or stream habitat condition.

146-14 Noxious weed control on public lands is approved by the BLM pursuant to the Northwest Area Noxious Weed Control Program EIS. Refer to that document for the analysis of impacts to fisheries. We do not anticipate that under "usual" application procedures, pesticide concentrations would reach toxic or fatal levels to aquatic life.

146-15 Each prescribed fire is preceded by a comprehensive prescribed fire management plan and environmental analysis. If a prescribed fire was proposed in an area where trout spawning could be adversely affected by sediment generated from the burn site, a buffer zone would be designated around the stream corridor to trap sediment. The size of the buffer would vary according to the type and season of the burn, but a standard buffer is 500 feet.

146-16 The RMP/EIS does not represent the final environmental analysis of the actions proposed in the alternative. Each management action (e.g., reservoir development, prescribed fire or oil and gas exploration) is preceded by a site specific environmental analysis. Water quality is a mandatory consideration in the environmental analysis of actions proposed or approved by the BLM.



147

WYOMING WILDLIFE FEDERATION

Wyoming Wildlife Federation
P.O. Box 106, Cheyenne, WY 82003
307-637-5433

December 30, 1986

RECEIVED
FEB 2
BUREAU OF LAND
WORLAND

Area Manager
Washakie Resource Area
Bureau of Land Management
P. O. Box 119
Worland, Wyoming 82401

Dear Sir,

After a review of the Washakie Resource Management Plan DEIS and Wilderness Supplement two things are evident:

One: the preferred alternative, A, would not protect wildlife values of the resource area as well as alternative D. The Wyoming Wildlife Federation would be inclined to support the more stringent regulation of other non-wildlife resource uses, that is provided for in alternative D.

Two: it is hard to imagine that five proposed Wilderness Study Areas do not have any acreage that should qualify for the Wilderness System.

It is apparent that wildlife populations would remain stable, or be enhanced by Wilderness designation in the 5 study areas. No Wilderness would generally impact wildlife values negatively according to the BLM analysis.

The preferred No-Wilderness Alternative does not enhannce the wildlife resource, or even maintain its stability. WWF suggests the final reflect a better mix, which includes wilderness protection in areas that are critical to wildlife.

WWF is especially concerned with how a No-Wilderness Alternative will impact crucial winter range, expecially for big-game species in the Medicine Lodge WSA, where up to 1,100 elk winter, and Alkalai and Trapper Creek WSA, where a substantial numbers of wintering ungulates occur.

WWF would prefer to see a mix of Wilderness, and Wilderness Enhancement that protects the wildlife resource, while providing prudent access for the public to enjoy the wildlife resource.

No Wilderness or No Wilderness Enhancement will not accomplish these goals. Please send us the Final Plan.

Sincerely,

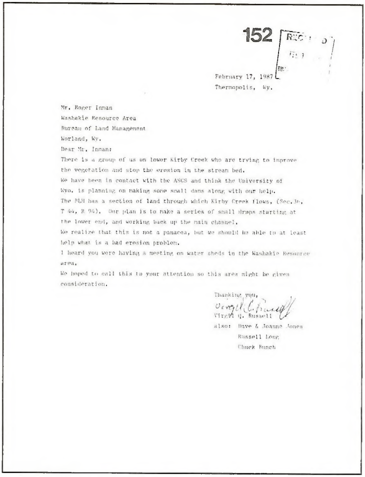
Matt Reid

Matt Reid
Education/Conservation Coordinator

MMR/cp

WORKING TODAY FOR WILDLIFE'S TOMORROW!

Wyoming Affiliate of the National Wildlife Federation



152

February 17, 1987
Thermopolis, Wy.

Mr. Roger Inman
Washakie Resource Area
Bureau of Land Management
Worland, Wy.

Dear Mr. Inman:

There is a group of us on lower Kirby Creek who are trying to improve the vegetation and stop the erosion in the stream bed.

We have been in contact with the ASCS and think the University of Wyo. is planning on making some small dams along with our help.

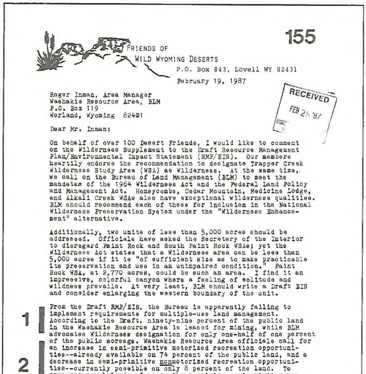
The BLM has a section of land through which Kirby Creek flows, (Sec.36, T 44, R 94). Our plan is to make a series of small drops starting at the lower end, and working back up the main channel.

We realize that this is not a panacea, but we should be able to at least help what is a bad erosion problem.

I heard you were having a meeting on water sheds in the Washakie Resource area.

We hoped to call this to your attention so this area might be given consideration.

Thanking you,
Virgil Q. Russell
also: Dave & Joanne Jones
Russell Long
Chuck Bunch



155

FRIENDS OF
WILD WYOMING DESERTS
P.O. Box 843, Lovell WY 82431

February 19, 1987

RECEIVED
FEB 26 '87

Roger Inman, Area Manager
Washakie Resource Area, BLM
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Inman:

On behalf of over 100 Desert Friends, I would like to comment on the Wilderness Supplement to the Draft Resource Management Plan/Environmental Impact Statement (RMP/EIS). Our members heartily endorse the recommendation to designate Trapper Creek Wilderness Study Area (WSA) as Wilderness. At the same time, we call on the Bureau of Land Management (BLM) to meet the mandates of the 1964 Wilderness Act and the Federal Land Policy and Management Act. Honeycombs, Cedar Mountain, Medicine Lodge, and Alkali Creek WSAs also have exceptional wilderness qualities. BLM should recommend each of these for inclusion in the National Wilderness Preservation System under the "Wilderness Enhancement" alternative.

Additionally, two units of less than 5,000 acres should be addressed. Officials have asked the Secretary of the Interior to disregard Paint Rock and South Paint Rock WSAs; yet the Wilderness Act states that a Wilderness area can be less than 5,000 acres if it is "of sufficient size as to make practicable its preservation and use in an unimpaired condition." Paint Rock WSA, at 2,770 acres, could be such an area. I find it an impressive, colorful canyon where a feeling of solitude and wildness prevails. At very least, BLM should write a Draft EIS and consider enlarging the western boundary of the unit.

1 From the Draft RMP/EIS, the Bureau is apparently failing to implement requirements for multiple-use land management. According to the Draft, ninety-nine percent of the public land in the Washakie Resource Area is leased for mining, while BLM advocates Wilderness designation for only one-half of one percent of the public acreage.

2 Washakie Resource Area officials call for an increase in semi-primitive motorized recreation opportunities--already available on 74 percent of the public land, and a decrease in semi-primitive nonmotorized recreation opportunities--currently possible on only 8 percent of the land. To preserve a multitude of uses, the remaining semi-primitve nonmotorized recreation opportunities should be protected by sensitive land management and designation of Wilderness areas.

Response to Letter 155

155-1 The Draft RMP/EIS states that approximately 99 percent of the resource area is currently leased for oil and gas, not for mining. There is a difference between oil and gas leasing under the Mineral Leasing Act and mining under the General Mining Law of 1872.

155-2 Some areas have leases that are not actually producing oil or gas and that would expire before any production is attained. Those areas would be reviewed prior to issuing new leases to determine their suitability for leasing. While we are predicting that most areas with expired leases would be re-leased, restrictions applied to the new leases would be more stringent in many cases than those on existing leases. That may, in fact, reduce the amount of impact on lands with semi-primitive nonmotorized recreation opportunities. Refer also to response 145-7.

The Draft RMP/EIS lists two primary criteria for assessing Wilderness suitability: 1)Wilderness Values, including those that expand the diversity of ecosystems and landforms in the National Wilderness Preservation System, and 2)Manageability. However, BLM states "The ecosystem diversity...(and) manageability of the five Wilderness Study Areas are not addressed within this document, but will be included in forthcoming Wilderness Study Reports." Readers must comment on the proposal without essential information. Officials of the Washakie Resource Area have presented no clear rationale for their failure to recommend designation of four WSAs.

BLM has consistently degraded the importance of Wilderness and the worthiness of each WSA. In practice, managers of the Worland District have not maintained signs at the WSA boundaries, and have done little to educate local publics about Wilderness values. The Draft RMP/EIS which they have written fails to make clear each WSA's exceptional wilderness character.

Each unit, according to BLM's Final Inventory Report of 1981, has "outstanding opportunities for solitude and primitive and unconfined recreation." Four units are "essentially natural," and Cedar Mountain WSA has "good potential for return to a higher degree of naturalness." While hiking and camping in the WSAs, I have seen that they encompass unique and dramatic scenery and other special features which should be protected by Wilderness status. These include:

Honeycombs WSA--21,000 acres
  crucial winter habitat for elk, mule deer, pronghorn and sage grouse
  year-round habitat for golden eagles
  large Tertiary mammalian fossil deposits
  archeological sites (BLM has not inventoried the area, but I have seen several well-formed and preserved artifacts there)
  high paleontologic potential
  badland topography reminiscent of Badlands National Monument

Cedar Mountain WSA--21,570 acres
  crucial mule deer range
  habitat for golden and bald eagles, prairie falcons, grey and chukar partridges, and bobcats
  reptilian and mammalian fossils, and petrified wood

Alkali Creek WSA--10,100 acres
  crucial elk and mule deer winter range
  habitat for golden eagles, chukar partridges, and bobcats
  sage grouse strutting grounds

Medicine Lodge WSA--7,740 acres
  critical elk and mule deer winter range
  habitat for bald and golden eagles, prairie falcons, turkeys, bobcats, mountain lions, sage and blue grouse, chukar partridges, and brown and rainbow trout
  scenic values which BLM rated "extremely high"

Medicine Lodge WSA (continued)
  water recharge areas for the Madison and Tensleep aquifers
  fossils from the lower Mississippian age

Trapper Creek WSA--7,200 acres (recommended by BLM)
  crucial elk and mule deer winter range
  habitat for bald eagles, peregrine falcons, sage grouse, and brown, cutthroat, and rainbow trout
  paleontology studies
  high quality scenery
  an ecosystem not affected by livestock

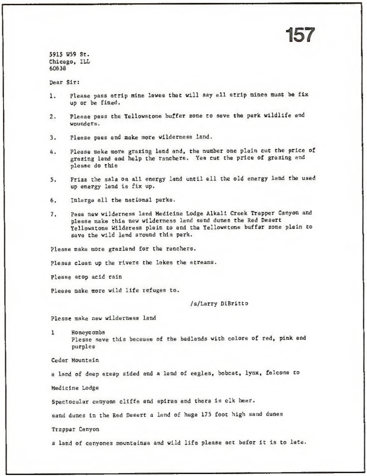
According to the Draft EIS, failure to designate these areas would allow development to displace big game from critical winter habitat and reduce the quality of hunting. Scenic and wildlife resources that currently attract recreation use could be "severly affected." Water quality would be degraded. BLM proposes an Area of Critical Environmental Concern for part of the Medicine Lodge WSA, claiming such status would protect important aquifer recharge zones. Since this WSA has many of the same merits and a larger acreage than Trapper Creek WSA, the Bureau appears to be avoiding a clear need for the broad protection of Wilderness status. In Cedar Mountain and Medicine Lodge WSAs, the proposed action would adversely impact bald eagle hunting territory. The Friends of Wild Wyoming Deserts feel that such lack of concern by BLM managers is unethical and unlawful.

In addition to skirting federal legislation, BLM has apparently ignored public support for Wilderness Areas in the Bighorn Basin. For example, due to local public input, Honeycombs WSA was initially inventoried at 68,000 acres. By the final inventory, though, BLM had reduced the unit to 21,000 acres, none of which are recommended for designation. Also, in neighboring Cody and Grass Creek Resource Areas, an overwhelming majority of letters received on a Draft EIS for four WSAs supported Wilderness designation. BLM should respond to our local and national need for Wilderness.

In summary, our organization finds the Draft RMP/EIS and Wilderness Supplement to be an incomplete document written with a strong bias for commodity production. I and other Desert Friends urge BLM managers to revise the Draft RMP/EIS to reflect a conservation ethic and a sensitivity for wildlife, recreation, scenery, and clean air and water. Our group hopes that the wild beauty of Wyoming can be enjoyed on public lands for generations to come.

Sincerely,
Lynn Kinter
Lynn Kinter
Director

cc:
Secretary of the Interior Donald Hodel, Representative Richard Cheney, Senator Alan Simpson, Senator Malcolm Wallop



157

5915 W59 St.
Chicago, ILL
60638

Dear Sir:

1. Please pass strip mine lawes that will say all strip mines must be fix up or be fined.
2. Please pass the Yellowstone buffer zone to save the park wildlife and wounders.
3. Please pass and make more wilderness land.
4. Please make more grazing land and, the number one plain cut the price of grazing land and help the ranchers. Yes cut the price of grazing and please do this
5. Frizz the sale on all energy land until all the old energy land the used up energy land is fix up.
6. Inlarge all the national parks.
7. Pass new wilderness land Medicine Lodge Alkali Creek Trapper Canyon and please make this new wilderness land sand dunes the Red Desert Yellowstone Wilderess plain to and the Yellowstone buffer zone plain to save the wild land around this park.

Please make more grazland for the ranchers.

Please clean up the rivers the lakes the streams.

Please stop acid rain

Please make more wild life refuges to.

/s/Larry DiBritto

Please make new wilderness land

1 Honeycombs
Please save this because of the badlands with colors of red, pink and purples

Cedar Mountain

a land of deep steep sided and a land of eagles, bobcat, lynx, falcons to

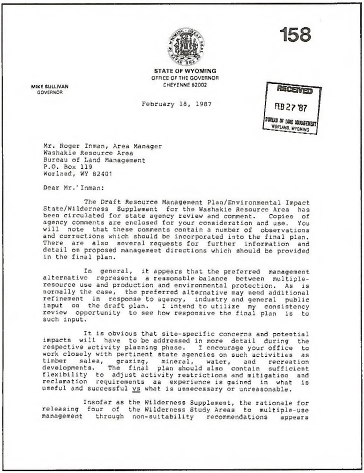
Medicine Lodge

Spectocular canyons cliffs and spires and there is elk heer.

sand dunes in the Red Desert a land of huge 175 foot high sand dunes

Trapper Canyon

a land of canyones mountainse and wild life please act befor it is to late.



158

STATE OF WYOMING
OFFICE OF THE GOVERNOR
CHEYENNE 82002

MIKE SULLIVAN
GOVERNOR

RECEIVED
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BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

February 18, 1987

Mr. Roger Inman, Area Manager
Washakie Resource Area
Bureau of Land Management
P.O. Box 119
Worland, WY 82401

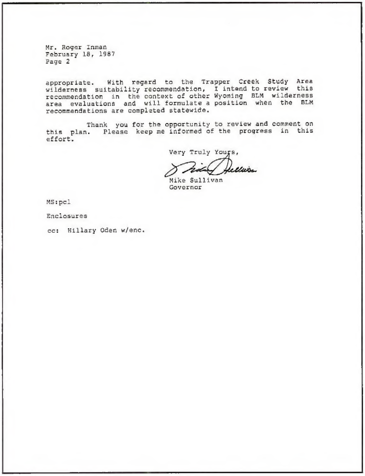
Dear Mr. Inman:

The Draft Resource Management Plan/Environmental Impact State/Wilderness Supplement for the Washakie Resource Area has been circulated for state agency review and comment. Copies of agency comments are enclosed for your consideration and use. You will note that these comments contain a number of observations and corrections which should be incorporated into the final plan. There are also several requests for further information and detail on proposed management directions which should be provided in the final plan.

In general, it appears that the preferred management alternative represents a reasonable balance between multiple-resource use and production and environmental protection. As is normally the case, the preferred alternative may need additional refinement in response to agency, industry and general public input on the draft plan. I intend to utilize my consistency review opportunity to see how responsive the final plan is to such input.

It is obvious that site-specific concerns and potential impacts will have to be addressed in more detail during the respective activity planning phase. I encourage your office to work closely with pertinent state agencies on such activities as timber sales, grazing, mineral, water, and recreation developments. The final plan should also contain sufficient flexibility to adjust activity restrictions and mitigation and reclamation requirements as experience is gained in what is useful and successful vs what is unnecessary or unreasonable.

Insofar as the Wilderness Supplement, the rationale for releasing four of the Wilderness Study Areas to multiple-use management through non-suitability recommendations appears



Mr. Roger Inman
February 18, 1987
Page 2

appropriate. With regard to the Trapper Creek Study Area wilderness suitability recommendation, I intend to review this recommendation in the context of other Wyoming BLM wilderness area evaluations and will formulate a position when the BLM recommendations are completed statewide.

Thank you for the opportunity to review and comment on this plan. Please keep me informed of the progress in this effort.

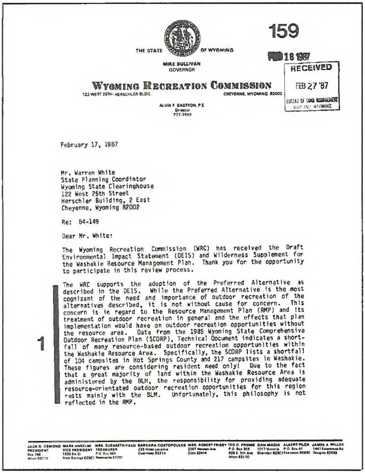
Very Truly Yours,

Mike Sullivan
Governor

MS:pcl

Enclosures

cc: Hillary Oden w/enc.



159

THE STATE OF WYOMING
MIKE SULLIVAN
GOVERNOR

WYOMING RECREATION COMMISSION
122 WEST 25TH · HERSCHLER BLDG. CHEYENNE, WYOMING 82002

ALVIN F. BASTRON, P.E.
Director
777-7695

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BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

February 17, 1987

Mr. Warren White
State Planning Coordintor
Wyoming State Clearinghouse
122 West 25th Street
Herschler Building, 2 East
Cheyenne, Wyoming 82002

Re: 84-149

Dear Mr. White:

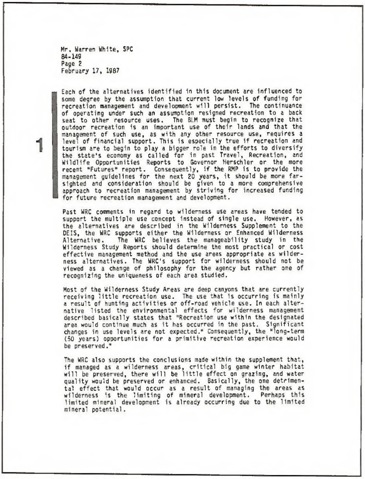
The Wyoming Recreation Commission (WRC) has received the Draft Environmental Impact Statement (DEIS) and Wilderness Supplement for the Washakie Resource Management Plan. Thank you for the opportunity to participate in this review process.

1 The WRC supports the adoption of the Preferred Alternative as described in the DEIS. While the Preferred Alternative is the most cognizant of the need and importance of outdoor recreation of the alternatives described, it is not without cause for concern. This concern is in regard to the Resource Management Plan (RMP) and its treatment of outdoor recreation in general and the effects that plan implementation would have on outdoor recreation opportunities without the resource area. Data from the 1985 Wyoming State Comprehensive Outdoor Recreation Plan (SCORP), Technical Document indicates a shortfall of many resource-based outdoor recreation opportunities within the Washakie Resource Area. Specifically, the SCORP lists a shortfall of 104 campsites in Hot Springs County and 217 campsites in Washakie. These figures are considering resident need only! Due to the fact that a great majority of land within the Washakie Resource Area is administered by the BLM, the responsibility for providing adequate resource-orientated outdoor recreation opportunities for this region rests mainly with the BLM. Unfortunately, this philosophy is not reflected in the RMP.

JACK D. OSMOND, PRESIDENT, Box 748, Afton 83110
MARK ANSELMI, VICE PRESIDENT, 1830 Elk St, Rock Springs 82901
MRS. ELIZABETH FIELD, TREASURER, P.O. Box 684, Newcastle 82701
BARBARA COSTOPOULOS, 233 West Laramie, Guernsey 82214
MRS. ROBERT FRISBY, 2007 Newton Ave, Cody 82414
TED C. FROME, P.O. Box 356, 909 E. 5th Ave, Afton 83110
DAN MADIA, 1017 Victoria, Sheridan 82801
ALBERT PILCH, P.O. Box AF, Evanston 82930
JAMES A. WILLOX, 1441 Esterbrook Rd, Douglas 82633

Response to Letter 159

159-1 We agree with the concerns raised, but with anticipated levels of funding, our general management emphasis will first have to be on extensive activities rather than on intensive, facility based activities. We can, however, gain attention for intensive management funding through activity planning, following the RMP.



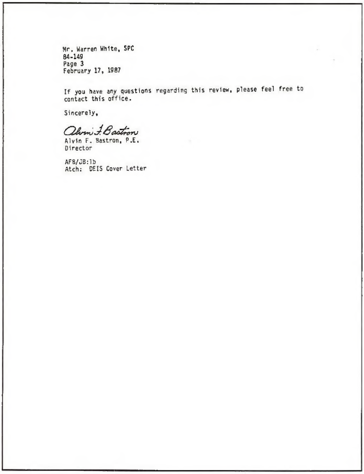
Mr. Warren White, SPC
84-149
Page 2
February 17, 1987

1 Each of the alternatives identified in this document are influenced to some degree by the assumption that current low levels of funding for recreation management and development will persist. The continuance of operating under such an assumption resigned recreation to a back seat to other resource uses. The BLM must begin to recognize that outdoor recreation is an important use of their lands and that the management of such use, as with any other resource use, requires a level of financial support. This is especially true if recreation and tourism are to begin to play a bigger role in the efforts to diversify the state's economy as called for in past Travel, Recreation, and Wildlife Opportunities Reports to Governor Herschler or the more recent "Futures" report. Consequently, if the RMP is to provide the management guidelines for the next 20 years, it should be more far-sighted and consideration should be given to a more comprehensive approach to recreation management by striving for increased funding for future recreation management and development.

Past WRC comments in regard to wilderness use areas have tended to support the multiple use concept instead of single use. However, as the alternatives are described in the Wilderness Supplement to the DEIS, the WRC supports either the Wilderness or Enhanced Wilderness Alternative. The WRC believes the manageability study in the Wilderness Study Reports should determine the most practical or cost effective management method and the use areas appropriate as wilderness alternatives. The WRC's support for wilderness should not be viewed as a change of philosophy for the agency but rather one of recognizing the uniqueness of each area studied.

Most of the Wilderness Study Areas are deep canyons that are currently receiving little recreation use. The use that is occurring is mainly a result of hunting activities or off-road vehicle use. In each alternative listed the environmental effects for wilderness management described basically states that "Recreation use within the designated area would continue much as it has occurred in the past. Significant changes in use levels are not expected." Consequently, the "long-term (50 years) opportunities for a primitive recreation experience would be preserved."

The WRC also supports the conclusions made within the supplement that, if managed as a wilderness areas, critical big game winter habitat will be preserved, there will be little effect on grazing, and water quality would be preserved or enhanced. Basically, the one detrimental effect that would occur as a result of managing the areas as wilderness is the limiting of mineral development. Perhaps this limited mineral development is already occurring due to the limited mineral potential.



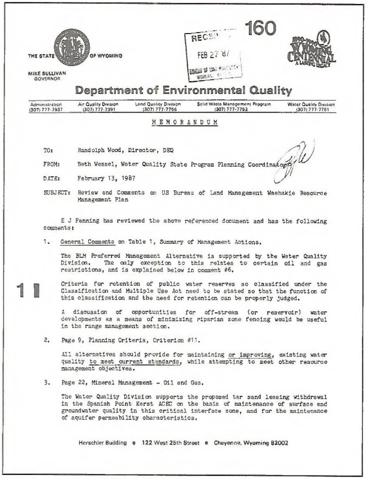
Mr. Warren White, SPC
84-149
Page 3
February 17, 1987

If you have any questions regarding this review, please feel free to contact this office.

Sincerely,

Alvin F. Bastron
Alvin F. Bastron, P.E.
Director

AFB/JB:lb
Atch: DEIS Cover Letter



160

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Department of Environmental Quality

Administration	Air Quality Division	Land Quality Division	Solid Waste Management Program	Water Quality Division
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MEMORANDUM

TO: Randolph Wood, Director, DEQ

FROM: Beth Wessel, Water Quality State Program Planning Coordinator

DATE: February 13, 1987

SUBJECT: Review and Comments on US Bureau of Land Management Washakie Resource Management Plan

E J Fenning has reviewed the above referenced document and has the following comments:

1. General Comments on Table 1, Summary of Management Actions.

   The BLM Preferred Management Alternative is supported by the Water Quality Division. The only exception to this relates to certain oil and gas restrictions, and is explained below in comment #6.

   1 Criteria for retention of public water reserves so classified under the Classification and Multiple Use Act need to be stated so that the function of this classification and the need for retention can be properly judged.

   A discussion of opportunities for off-stream (or reservoir) water developments as a means of minimizing riparian zone fencing would be useful in the range management section.

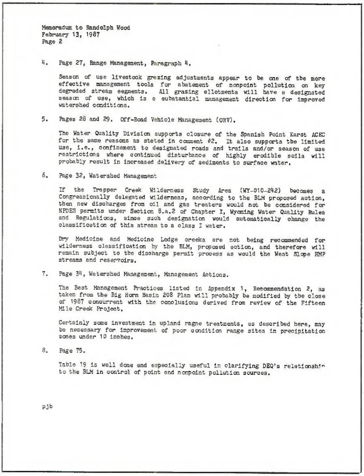
2. Page 9, Planning Criteria, Criterion #11.

   All alternatives should provide for maintaining or improving, existing water quality to meet current standards, while attempting to meet other resource management objectives.

3. Page 22, Mineral Management - Oil and Gas.

   The Water Quality Division supports the proposed tar sand leasing withdrawal in the Spanish Point Karst ACEC on the basis of maintenance of surface and groundwater quality in this critical interface zone, and for the maintenance of aquifer permeability characteristics.

Herschler Building • 122 West 25th Street • Cheyenne, Wyoming 82002



Memoradum to Randolph Wood
February 13, 1987
Page 2

4. Page 27, Range Management, Paragraph 4.

   Season of use livestock grazing adjustments appear to be one of the more effective management tools for abatement of nonpoint pollution on key degraded stream segments. All grazing allotments will have a designated season of use, which is a substantial management direction for improved watershed conditions.

5. Pages 28 and 29. Off-Road Vehicle Management (ORV).

   The Water Quality Division supports closure of the Spanish Point Karst ACEC for the same reasons as stated in comment #2. It also supports the limited use, i.e., confinement to designated roads and trails and/or season of use restrictions where continued disturbance of highly erodible soils will probably result in increased delivery of sediments to surface water.

6. Page 32, Watershed Management

   If the Trapper Creek Wilderness Study Area (WY-010-242) becomes a Congressionally delegated wilderness, according to the BLM proposed action, then new discharges from oil and gas treaters would not be considered for NPDES permits under Section 8.a.2 of Chapter I, Wyoming Water Quality Rules and Regulations, since such designation would automatically change the classification of this stream to a class I water.

   Dry Medicine and Medicine Lodge creeks are not being recommended for wilderness classification by the BLM, proposed action, and therefore will remain subject to the discharge permit process as would the West Slope HMP streams and reservoirs.

7. Page 34, Watershed Management, Management Actions.

   The Best Management Practices listed in Appendix 1, Recommendation 2, as taken from the Big Horn Basin 208 Plan will probably be modified by the close of 1987 concurrent with the conclusions derived from review of the Fifteen Mile Creek Project.

   Certainly some investment in upland ragne treatments, as described here, may be necessary for improvement of poor condition range sites in precipitation zones under 10 inches.

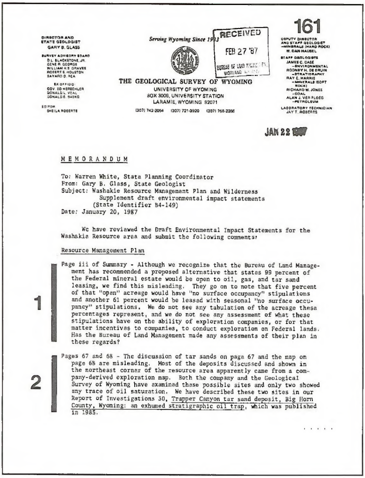
8. Page 75.

   Table 19 is well done and especially useful in clarifying DEQ's relationship to the BLM in control of point and nonpoint pollution sources.

pjb

Response to Letter 160

160-1 Public water reserves (PWRs) were not classified under the Classification and Multiple Use Act, but were withdrawn under Executive Orders and other classifications. The PWRs in the Washakie Resource Area have been quantified and submitted to the Special Master for the Wyoming Water Division 3 Adjudication. A list of PWRs, as defined by the adjudication process, can be found in the Partial Interlocutory Decree, Big Horn Adjudication, Covering the United States' Non-Indian Claims, 1983. A summary of the locations of PWRs is found in Appendix N.



161

DIRECTOR AND
STATE GEOLOGIST
GARY B. GLASS

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LABORATORY TECHNICIAN
JAY T. ROBERTS

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WORLAND [illegible]

JAN 22 [illegible]

M E M O R A N D U M

To: Warren White, State Planning Coordinator
From: Gary B. Glass, State Geologist
Subject: Washakie Resource Management Plan and Wilderness
Supplement draft environmental impact statements
(State Identifier 84-149)
Date: January 20, 1987

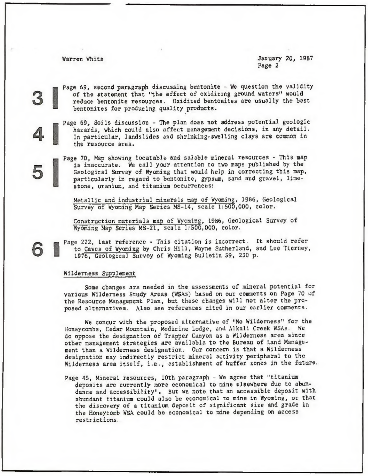
We have reviewed the Draft Environmental Impact Statements for the Washakie Resource area and submit the following comments:

Resource Management Plan

1 Page iii of Summary - Although we recognize that the Bureau of Land Management has recommended a proposed alternative that states 99 percent of the Federal mineral estate would be open to oil, gas, and tar sand leasing, we find this misleading. They go on to note that five percent of that "open" acreage would have "no surface occupancy" stipulations and another 61 percent would be leased with seasonal "no surface occupancy" stipulations. We do not see any tabulation of the acreage these percentages represent, and we do not see any assessment of what these stipulations have on the ability of exploration companies, or for that matter incentives to companies, to conduct exploration on Federal lands. Has the Bureau of Land Management made any assessments of their plan in these regards?

2 Pages 67 and 68 - The discussion of tar sands on page 67 and the map on page 68 are misleading. Most of the deposits discussed and shown in the northeast corner of the resource area apparently came from a company-derived exploration map. Both the company and the Geological Survey of Wyoming have examined these possible sites and only two showed any trace of oil saturation. We have described these two sites in our Report of Investigations 30, Trapper Canyon tar sand deposit, Big Horn County, Wyoming: an exhumed stratigraphic oil trap, which was published in 1985.

. . . . .



Warren White
January 20, 1987
Page 2

3 Page 69, second paragraph discussing bentonite - We question the validity of the statement that "the effect of oxidizing ground waters" would reduce bentonite resources. Oxidized bentonites are usually the best bentonites for producing quality products.

4 Page 69, Soils discussion - The plan does not address potential geologic hazards, which could also affect management decisions, in any detail. In particular, landslides and shrinking-swelling clays are common in the resource area.

5 Page 70, Map showing locatable and salable mineral resources - This map is inaccurate. We call your attention to two maps published by the Geological Survey of Wyoming that would help in correcting this map, particularly in regard to bentonite, gypsum, sand and gravel, limestone, uranium, and titanium occurrences:

Metallic and industrial minerals map of Wyoming, 1986, Geological Survey of Wyoming Map Series MS-14, scale 1:500,000, color.

Construction materials map of Wyoming, 1986, Geological Survey of Wyoming Map Series MS-21, scale 1:500,000, color.

6 Page 222, last reference - This citation is incorrect. It should refer to Caves of Wyoming by Chris Hill, Wayne Sutherland, and Lee Tierney, 1976, Geological Survey of Wyoming Bulletin 59, 230 p.

Wilderness Supplement

Some changes are needed in the assessments of mineral potential for various Wilderness Study Areas (WSAs) based on our comments on Page 70 of the Resource Management Plan, but these changes will not alter the proposed alternatives. Also see references cited in our earlier comments.

We concur with the proposed alternative of "No Wilderness" for the Honeycombs, Cedar Mountain, Medicine Lodge, and Alkali Creek WSAs. We do oppose the designation of Trapper Canyon as a Wilderness area since other management strategies are available to the Bureau of Land Management than a Wilderness designation. Our concern is that a Wilderness designation may indirectly restrict mineral activity peripheral to the Wilderness area itself, i.e., establishment of buffer zones in the future.

Page 45, Mineral resources, 10th paragraph - We agree that "titanium deposits are currently more economical to mine elsewhere due to abundance and accessibility". But we note that an accessible deposit with abundant titanium could also be economical to mine in Wyoming, or that the discovery of a titanium deposit of significant size and grade in the Honeycomb WSA could be economical to mine depending on access restrictions.

Response to Letter 161

161-1 The text of the Preferred Alternative and Table 6 in the Draft RMP/EIS (both on page 22) provide acreage tabulations. Each of the descriptions of the other alternatives has similar tabulations. For the Preferred Alternative, the impacts related to oil and gas exploration are discussed on pages 110 and 118. Similar discussions are found in the other alternatives.

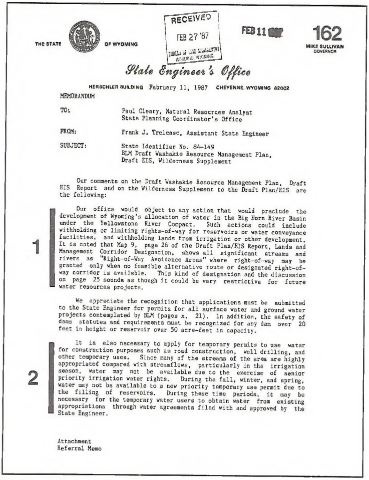
161-2 On the basis of these comments and additional information we have developed, we have modified the discussions of tar sands in the text and have revised Map 20.

161-3 The discussion of bentonite in Chapter 3 (Affected Environment) has been modified to reflect more current information. We have removed the statements about depth of burial and oxidizing groundwaters, based on that information and these comments, because the reference was confusing and not really related to the rest of the discussion on bentonite.

161-4 The soils information maintained at the district office includes discussions of shrink-swell hazards in selected soils in the planning area. Although such hazards are most common in general soil units B2, B3 and B4, their distribution is relatively scattered. Activities that would be affected by shrink-swell clays and landslide hazards require on-site BLM reviews of site suitability to ensure that such limitations do not pose safety or other problems. The text has been revised to acknowledge these hazard features.

161-5 Revisions to Map 21 have been made to clarify confusion about the location of known locatable and salable mineral resources. As indicated on page 69 of the Draft RMP/EIS, Map 21 shows the location of sand and gravel pits in the planning area, not the known extent of sand and gravel resources.

161-6 Because of a typing error, two references were combined. The references have been corrected.



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162

MIKE SULLIVAN
GOVERNOR

State Engineer's Office

HERSCHLER BUILDING February 11, 1987 CHEYENNE, WYOMING 82002

MEMORANDUM

TO: Paul Cleary, Natural Resources Analyst
State Planning Coordinator's Office

FROM: Frank J. Trelease, Assistant State Engineer

SUBJECT: State Identifier No. 84-149
BLM Draft Washakie Resource Management Plan,
Draft EIS, Wilderness Supplement

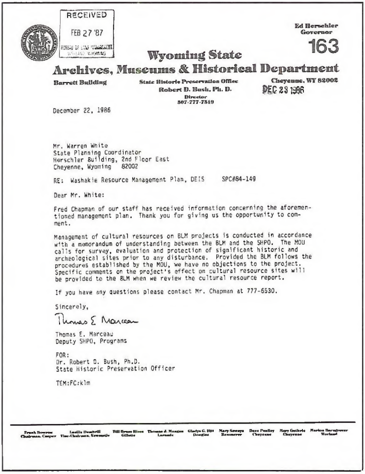
Our comments on the Draft Washakie Resource Management Plan, Draft EIS Report and on the Wilderness Supplement to the Draft Plan/EIS are the following:

1 Our office would object to any action that would preclude the development of Wyoming's allocation of water in the Big Horn River Basin under the Yellowstone River Compact. Such actions could include withholding or limiting rights-of-way for reservoirs or water conveyance facilities, and withholding lands from irrigation or other development. It is noted that Map 9, page 26 of the Draft Plan/EIS Report, Lands and Management Corridor Designation, shows all significant streams and rivers as "Right-of-Way Avoidance Areas" where right-of-way may be granted only when no feasible alternative route or designated right-of-way corridor is available. This kind of designation and the discussion on page 25 sounds as though it could be very restrictive for future water resources projects.

We appreciate the recognition that applications must be submitted to the State Engineer for permits for all surface water and ground water projects contemplated by BLM (pages x, 21). In addition, the safety of dams statutes and requirements must be recognized for any dam over 20 feet in height or reservoir over 50 acre-feet in capacity.

2 It is also necessary to apply for temporary permits to use water for construction purposes such as road construction, well drilling, and other temporary uses. Since many of the streams of the area are highly appropriated compared with streamflows, particularly in the irrigation season, water may not be available due to the exercise of senior priority irrigation water rights. During the fall, winter, and spring, water may not be available to a new priority temporary use permit due to the filling of reservoirs. During these time periods, it may be necessary for the temporary water users to obtain water from existing appropriations through water agreements filed with and approved by the State Engineer.

Attachment
Referral Memo



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Ed Herschler
Governor

163

Wyoming State
Archives, Museums & Historical Department

Barrett Building
State Historic Preservation Office
Robert D. Bush, Ph. D.
Director
307-777-7519
Cheyenne, WY 82002

DEC 23 1986

December 22, 1986

Mr. Warren White
State Planning Coordinator
Herschler Building, 2nd Floor East
Cheyenne, Wyoming 82002

RE: Washakie Resource Management Plan, DEIS SPC#84-149

Dear Mr. White:

Fred Chapman of our staff has received information concerning the aforementioned management plan. Thank you for giving us the opportunity to comment.

Management of cultural resources on BLM projects is conducted in accordance with a memorandum of understanding between the BLM and the SHPO. The MOU calls for survey, evaluation and protection of significant historic and archeological sites prior to any disturbance. Provided the BLM follows the procedures established by the MOU, we have no objections to the project. Specific comments on the project's effect on cultural resource sites will be provided to the BLM when we review the cultural resource report.

If you have any questions please contact Mr. Chapman at 777-6530.

Sincerely,

Thomas E. Marceau

Thomas E. Marceau
Deputy SHPO, Programs

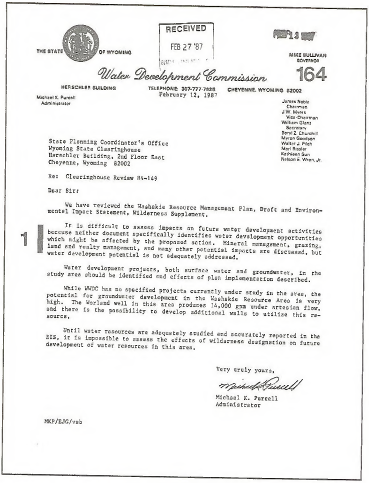
FOR:
Dr. Robert D. Bush, Ph.D.
State Historic Preservation Officer

TEM:FC:klm

Response to Letter 162

162-1 Since most water developments likely to be constructed would include structures such as dams and diversion works, and there is realistically no feasible alternative placement for a dam or diversion other than on a stream or river, it is very likely that the necessary right-of-way would be granted to the State, or other responsible party, providing necessary requirements, mitigations or stipulations were met. The restrictions on rights-of-way and the designation of corridors in the Draft RMP/EIS are primarily related to transportation and energy transmission systems.

162-2 The text in the description of Management Common to All Alternatives has been modified to include temporary water use permits.



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MIKE SULLIVAN
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Water Development Commission

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Myron Goodson
Walter J. Pilch
Merl Rissler
Kathleen Sun
Nelson E. Wren, Jr.

164

February 12, 1987

State Planning Coordinator's Office
Wyoming State Clearinghouse
Herschler Building, 2nd Floor East
Cheyenne, Wyoming 82002

Re: Clearinghouse Review 84-149

Dear Sir:

We have reviewed the Washakie Resource Management Plan, Draft and Environmental Impact Statement, Wilderness Supplement.

1 It is difficult to assess impacts on future water development activities because neither document specifically identifies water development opportunities which might be affected by the proposed action. Mineral management, grazing, land and realty management, and many other potential impacts are discussed, but water development potential is not adequately addressed.

Water development projects, both surface water and groundwater, in the study area should be identified and effects of plan implementation described.

While WWDC has no specified projects currently under study in the area, the potential for groundwater development in the Washakie Resource Area is very high. The Worland well in this area produces 14,000 gpm under artesian flow, and there is the possibility to develop additional wells to utilize this resource.

Until water resources are adequately studied and accurately reported in the EIS, it is impossible to assess the effects of wilderness designation on future development of water resources in this area.

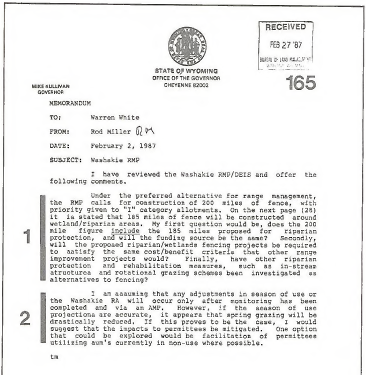
Very truly yours,

Michael K. Purcell
Administrator

MKP/EJG/vsb

Response to Letter 164

164-1 The purpose of the RMP/EIS is to analyze land management options for actions that the BLM would authorize or initiate in the foreseeable future. An analysis of water development potential, on a scale apparently envisioned by the Commission, is not within the scope of the RMP/EIS. Activity plans such as allotment and habitat management plans address water development potential relative to our management on a regional or local basis. The effects of projects proposed in those plans are analyzed on a case-by-case basis as part of project planning.



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BUREAU OF LAND MANAGEMENT

STATE OF WYOMING
OFFICE OF THE GOVERNOR
CHEYENNE 82002

MIKE SULLIVAN
GOVERNOR

165

MEMORANDUM

TO: Warren White

FROM: Rod Miller RM

DATE: February 2, 1987

SUBJECT: Washakie RMP

I have reviewed the Washakie RMP/DEIS and offer the following comments.

1 Under the preferred alternative for range management, the RMP calls for construction of 200 miles of fence, with priority given to "I" category allotments. On the next page (28) it is stated that 185 miles of fence will be constructed around wetland/riparian areas. My first question would be, does the 200 mile figure include the 185 miles proposed for riparian protection, and will the funding source be the same? Secondly, will the proposed riparian/wetlands fencing projects be required to satisfy the same cost/benefit criteria that other range improvement projects would? Finally, have other riparian protection and rehabilitation measures, such as in-stream structures and rotational grazing schemes been investigated as alternatives to fencing?

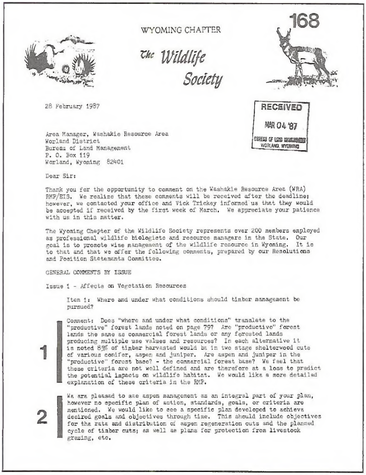
2 I am assuming that any adjustments in season of use on the Washakie RA will occur only after monitoring has been completed and via an AMP. However, if the season of use projections are accurate, it appears that spring grazing will be drastically reduced. If this proves to be the case, I would suggest that the impacts to permittees be mitigated. One option that could be explored would be facilitation of permittees utilizing aum's currently in non-use where possible.

tm

Response to Letter 165

165-1 The 200 miles of fencing proposed in the Preferred Alternative under range management are in addition to the 185 miles proposed for use in improvement of wetland/riparian habitat. Wetland/riparian fencing projects would be subjected to benefit/cost analysis. Depending on the objective of a particular fencing project (such as protection of threatened and endangered species habitat), a positive benefit/cost may not be the deciding factor in the decision to construct the project. Refer also to response 96-3. A number of measures for restoring and improving degraded wetland/riparian areas were considered, including changes in grazing systems (refer to page 18 of the Draft RMP/EIS). Fencing would be used only as necessary, when such methods as changes in season of use or adjustments in stocking rates cannot be implemented.

165-2 As stated on page 28 of the Draft RMP/EIS, adjustments in grazing use, including season of use, would be made following monitoring or through agreements between permittees and the BLM. There are several options that may be used to mitigate adjustments in annual spring use. Later turnout dates are an option, as are grazing systems that meet the general criteria described in the revised Appendix E.



168

WYOMING CHAPTER

The Wildlife Society

28 February 1987

RECEIVED
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BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

Area Manager, Washakie Resource Area
Worland District
Bureau of Land Management
P. O. Box 119
Worland, Wyoming 82401

Dear Sir:

Thank you for the opportunity to comment on the Washakie Resource Area (WRA) RMP/EIS. We realize that these comments will be received after the deadline; however, we contacted your office and Vick Trickey informed us that they would be accepted if received by the first week of March. We appreciate your patience with us in this matter.

The Wyoming Chapter of the Wildlife Society represents over 200 members employed as professional wildlife biologists and resource managers in the State. Our goal is to promote wise management of the wildlife resource in Wyoming. It is to that end that we offer the following comments, prepared by our Resolutions and Position Statements Committee.

GENERAL COMMENTS BY ISSUE

Issue 1 - Affects on Vegetation Resources

Item 1: Where and under what conditions should timber management be pursued?

1 Comment: Does "where and under what conditions" translate to the "productive" forest lands noted on page 79? Are "productive" forest lands the same as commercial forest lands or any forested lands producing multiple use values and resources? In each alternative it is noted 85% of timber harvested would be in two stage shelterwood cuts of various conifer, aspen and juniper. Are aspen and juniper in the "productive" forest base? - the commercial forest base? We feel that these criteria are not well defined and are therefore at a loss to predict the potential impacts on wildlife habitat. We would like a more detailed explanation of these criteria in the RMP.

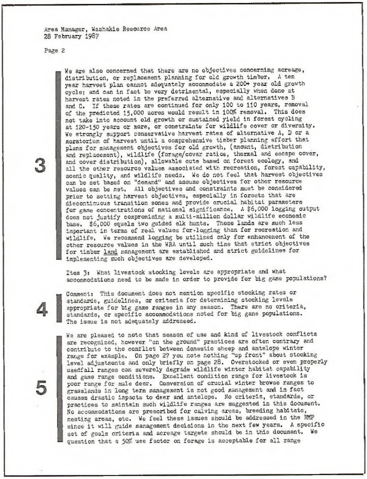
2 We are pleased to see aspen management as an integral part of your plan, however no specific plan of action, standards, goals, or criteria are mentioned. We would like to see a specific plan developed to achieve desired goals and objectives through time. This should include objectives for the rate and distribution of aspen regeneration cuts and the planned cycle of timber cuts; as well as plans for protection from livestock grazing, etc.

Response to Letter 168

168-1 The harvest of timber will be from the **timber production base**. References on page 79 and in Table 21 of the Draft RMP/EIS have been modified to clarify that point. Aspen and juniper are classified as non-suitable forest land or woodland. These types are not included in the timber production base.

168-2 A forest management plan (FMP) will be developed to include objectives for the rate and distribution of aspen regeneration cuts. The FMP will also include harvest objectives and schedules for aspen and other timber types.

168-3 Old growth timber is addressed in the Draft RMP/EIS. Approximately 15 percent of the productive forest land is classified as non-suitable for the production of forest products on a sustained yield basis. This land is presently being managed for old growth since no harvest prescriptions are being written for it. As other resource management programs, such as soil and water and wildlife, develop objectives in relation to the forest lands, a variety of options for old growth management to meet those objectives will be analyzed. The harvest level of 120 to 130



Area Manager, Washakie Resource Area
28 February 1987

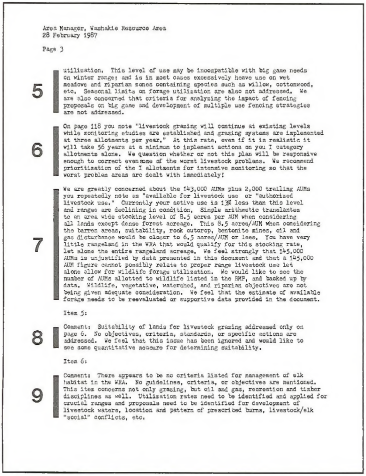
Page 2

3 We are also concerned that there are no objectives concerning acreage, distribution, or replacement planning for old growth timber. A ten year harvest plan cannot adequately accommodate a 200+ year old growth cycle; and can in fact be very detrimental, especially when done at harvest rates noted in the preferred alternative and alternatives B and C. If these rates are continued for only 100 to 110 years, removal of the predicted 15,000 acres would result in 100% removal. This does not take into account old growth or sustained yield in forest cycling at 120-150 years or more, or constraints for wildlife cover or diversity. We strongly support conservative harvest rates of alternative A, D or a moratorium of harvest until a comprehensive timber planning effort that plans for management objectives for old growth, (amount, distribution and replacement), wildlife (forage/cover ratios, thermal and escape cover, and cover distribution), allowable cuts based on forest ecology, and all the other resource values associated with recreation, forest capability, scenic quality, and wildlife needs. We do not feel that harvest objectives can be set based on "demand" and assume objectives for other resource values can be met. All objectives and constraints must be considered prior to setting harvest objectives, especially in forests that are discontinuous transition zones and provide crucial habitat parameters for game concentrations of national significance. A $6,000 logging output does not justify compromising a multi-million dollar wildlife economic base. $6,000 equals two guided elk hunts. These lands are much less important in terms of real values for logging than for recreation and wildlife. We recommend logging be utilized only for enhancement of the other resource values in the WRA until such time that strict objectives for timber land management are established and strict guidelines for implementing such objectives are developed.

Item 3: What livestock stocking levels are appropriate and what accommodations need to be made in order to provide for big game populations?

4 Comment: This document does not mention specific stocking rates or standards, guidelines, or criteria for determining stocking levels appropriate for big game ranges in any season. There are no criteria, standards, or specific accommodations noted for big gane populations. The issue is not adequately addressed.

5 We are pleased to note that season of use and kind of livestock conflicts are recognized, however "on the ground" practices are often contrary and contribute to the conflict between domestic sheep and antelope winter range for example. On page 27 you note nothing "up front" about stocking level adjustments and only briefly on page 28. Overstocked or even properly usedfall ranges can severely degrade wildlife winter habitat capability and game range conditions. Excellent condition range for livestock is poor range for mule deer. Conversion of crucial winter browse ranges to grasslands in long term management is not good management and in fact causes drastic impacts to deer and antelope. No criteria, standards, or practices to maintain such wildlife ranges are suggested in this document. No accommodations are prescribed for calving areas, breeding habitats, nesting areas, etc. We feel these issues should be addressed in the RMP since it will guide management decisions in the next few years. A specific set of goals criteria and acreage targets should be in this document. We question that a 50% use factor on forage is acceptable for all range



Area Manager, Washakie Resource Area
28 February 1987

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5 utilization. This level of use may be incompatible with big game needs on winter range; and is in most cases excessively heave use on wet meadows and riparian zones containing species such as willow, cottonwood, etc. Seasonal limits on forage utilization are also not addressed. We are also concerned that criteria for analyzing the impact of fencing proposals on big game and development of multiple use fencing strategies are not addressed.

6 On page 118 you note "livestock grazing will continue at existing levels while monitoring studies are established and grazing systems are implemented at three allotments per year." At this rate, even if it is realistic it will take 56 years at a minimum to implement actions on you I category allotments alone. We question whether or not this plan will be responsive enough to correct even some of the worst livestock problems. We recommend prioritization of the I allotments for intensive monitoring so that the worst problem areas are dealt with immediately!

7 We are greatly concerned about the 143,000 AUMs plus 2,000 trailing AUMs you repeatedly note as "available for livestock use or "authorized livestock use." Currently your active use is 13% less than this level and ranges are declining in condition. Simple arithmetic translates to an area wide stocking level of 8.5 acres per AUM when considering all lands except dense forest acreage. This 8.5 acres/AUM when considering the barren areas, suitability, rock outcrop, bentonite mines, oil and gas disturbance would be closer to 6.5 acres/AUM or less. You have very little rangeland in the WRA that would qualify for this stocking rate, let alone the entire rangeland acreage. We feel strongly that 145,000 AUMs is unjustified by data presented in this document and that a 145,000 AUM figure cannot possibly relate to proper range livestock use let alone allow for wildlife forage utilization. We would like to see the number of AUMs allotted to wildlife listed in the RMP, and backed up by data. Wildlife, vegetative, watershed, and riparian objectives are not being given adequate consideration. We feel that the estimate of available forage needs to be reevaluated or supportive data provided in the document.

Item 5:

8 Comment: Suitability of lands for livestock grazing addressed only on page 6. No objectives, criteria, standards, or specific actions are addressed. We feel that this issue has been ignored and would like to see some quantitative measure for determining suitability.

Item 6:

9 Comment: There appears to be no criteria listed for management of elk habitat in the WRA. No guidelines, criteria, or objectives are mentioned. This item concerns not only grazing, but oil and gas, recreation and timber disciplines as well. Utilization rates need to be identified and applied for crucial ranges and proposals need to be identified for development of livestock waters, location and pattern of prescribed burns, livestock/elk "social" conflicts, etc.

acres per year from the timber production base is predicated on a rotation of 120 years. This rotation does not affect any of the forest land currently retained in old growth. The timber harvest proposed in the Preferred Alternative would be designed to accomplish a number of objectives, including several directly related to wildlife habitat (page 27 of the Draft RMP/EIS). Our intentions relative to timber harvest have been clarified and the text modified where appropriate.

168-4 Current livestock stocking rates are listed in Appendix D. The determination of future stocking rates would be based on a number of factors, including the results of monitoring and the criteria listed in Appendix E.

168-5 A goal of alternative development was that each alternative would provide all wildlife habitat components in sufficient amounts to support Wyoming Game and Fish Department Strategic Plan population goals. Although this goal was unmet in some alternatives, we predict in the Preferred Alternative that we can provide sufficient habitat to meet population goals.

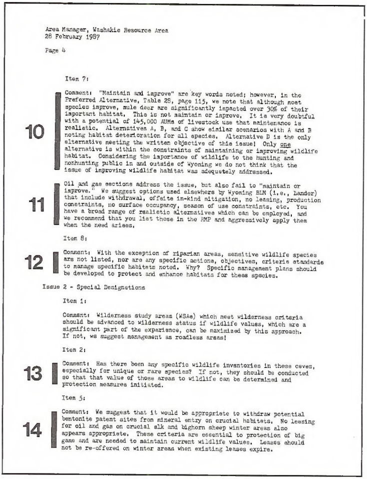
The discussion of fish and wildlife management on page 18 of the Draft RMP/EIS lists a number of specific practices and accommodations for wildlife habitat, as well as how wildlife forage and habitat are to be treated. It is our objective to reduce or eliminate forage and spatial competition between wildlife and livestock through the use of proper management practices, including those items described on page 18.

Adjustments in livestock stocking rates would be made on a case-by-case basis (see page 27 of the Draft RMP/EIS). These adjustments would be made using baseline vegetation data and monitoring information or through agreements with permittees or lessees.

Appendix E states that the use of key species on selected key areas would be limited to a level that would meet allotment management objectives. The normal maximum use level is shown as 50 percent. That level is for all uses, not just livestock use.

Fencing requirements and strategies are described in Bureau manuals and handbooks, which are readily available for public review. It is not necessary to reprint them in the RMP/EIS. The impacts of fencing projects are analyzed on a case-by-case basis in our environmental analysis process.

168-6 The allotment categorization process was the first step in establishing priorities for action on all allotments. Within the "I" category, each allotment was ranked to



Area Manager, Washakie Resource Area
28 February 1987

Page 4

Item 7:

10 Comment: "Maintain and improve" are key words noted; however, in the Preferred Alternative, Table 28, page 115, we note that although most species improve, mule deer are significantly impacted over 30% of their important habitat. This is not maintain or improve. It is very doubtful with a potential of 145,000 AUMs of livestock use that maintenance is realistic. Alternatives A, B, and C show similar scenarios with A and B noting habitat deterioration for all species. Alternative D is the only alternative meeting the written objective of this issue! Only one alternative is within the constraints of maintaining or improving wildlife habitat. Considering the importance of wildlife to the hunting and nonhunting public in and outside of Wyoming we do not think that the issue of improving wildlife habitat was adequately addressed.

11 Oil and gas sections address the issue, but also fail to "maintain or improve." We suggest options used elsewhere by Wyoming BLM (i.e., Lander) that include withdrawal, offsite in-kind mitigation, no leasing, production constraints, no surface occupancy, season of use constraints, etc. You have a broad range of realistic alternatives which can be employed, and we recommend that you list those in the RMP and aggressively apply them when the need arises.

Item 8:

12 Comment: With the exception of riparian areas, sensitive wildlife species are not listed, nor are any specific actions, objectives, criteria standards to manage specific habitats noted. Why? Specific management plans should be developed to protect and enhance habitats for these species.

Issue 2 - Special Designations

Item 1:

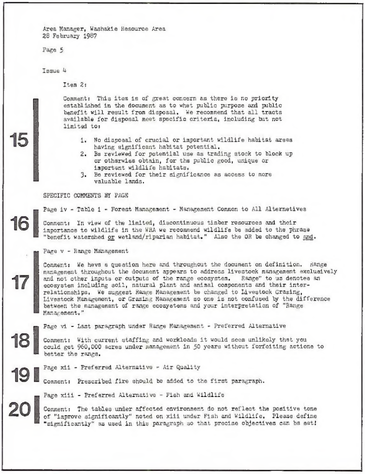
Comment: Wilderness study areas (WSAs) which meet wilderness criteria should be advanced to wilderness status if wildlife values, which are a significant part of the experience, can be maximized by this approach. If not, we suggest management as roadless areas!

Item 2:

13 Comment: Has there been any specific wildlife inventories in these caves, especially for unique or rare species? If not, they should be conducted so that that value of those areas to wildlife can be determined and protection measures initiated.

Item 5:

14 Comment: We suggest that it would be appropriate to withdraw potential bentonite patent sites from mineral entry on crucial habitats. No leasing for oil and gas on crucial elk and bighorn sheep winter areas also appears appropriate. These criteria are essential to protection of big game and are needed to maintain current wildlife values. Leases should not be re-offered on winter areas when existing leases expire.



Area Manager, Washakie Resource Area
28 February 1987

Page 5

Issue 4

Item 2:

15 Comment: This item is of great concern as there is no priority established in the document as to what public purpose and public benefit will result from disposal. We recommend that all tracts available for disposal meet specific criteria, including but not limited to:

1. No disposal of crucial or important wildlife habitat areas having significant habitat potential.
2. Be reviewed for potential use as trading stock to block up or otherwise obtain, for the public good, unique or important wildlife habitats.
3. Be reviewed for their significance as access to more valuable lands.

SPECIFIC COMMENTS BY PAGE

16 Page iv - Table 1 - Forest Management - Management Common to All Alternatives

Comment: In view of the limited, discontinuous timber resources and their importance to wildlife in the WRA we recommend wildlife be added to the phrase "benefit watershed or wetland/riparian habitat." Also the OR be changed to and.

17 Page v - Range Management

Comment: We have a question here and throughout the document on definition. Range management throughout the document appears to address livestock management exclusively and not other inputs or outputs of the range ecosystem. Range" to us denotes an ecosystem including soil, natural plant and animal components and their interrelationships. We suggest Range Management be changed to Livestock Grazing, Livestock Management, or Grazing Management so one is not confused by the difference between the management of range ecosystems and your interpretation of "Range Management."

18 Page vi - Last paragraph under Range Management - Preferred Alternative

Comment: With current staffing and workloads it would seem unlikely that you could get 960,000 acres under management in 50 years without forfeiting actions to better the range.

19 Page xii - Preferred Alternative - Air Quality

Comment: Prescribed fire should be added to the first paragraph.

20 Page xiii - Preferred Alternative - Fish and Wildlife

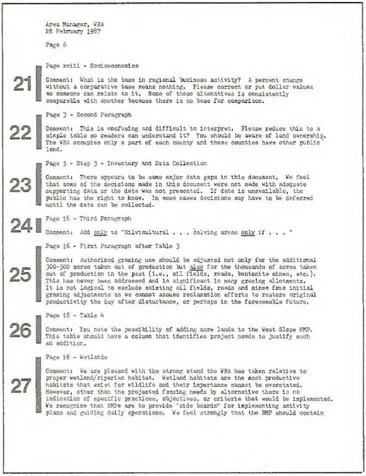
Comment: The tables under affected environment do not reflect the positive tone of "improve significantly" noted on xiii under Fish and Wildlife. Please define "significantly" as used in this paragraph so that precise objectives can be set!

further define priorities. The Range Program Summary, which will be published with the Approved Management Plan, will announce the priority order of allotments. The allotments with the highest priority will be those with the greatest current conflicts with other uses, or those with the greatest potential for improvement.

168-7 The current level of 143,000 AUMS of livestock use was established through an adjudication process in the mid-1960s. The AUMs for wildlife were also allocated at that time. In accordance with current BLM policy, adjustments to the current level of livestock use would be made when acceptable data are available. In the Washakie Resource Area, this would necessitate the collection of monitoring data for use with existing baseline vegetation data to support use adjustments. The vegetation needs for wildlife use, watershed protection, vegetation maintenance and livestock use can be determined best by establishing specific allotment objectives and monitoring current use to establish the levels of adjustment needed to attain the objectives.

168-8 The determination of areas suitable for livestock grazing has been de-emphasized because of the Bureau's policy to monitor allotments before any adjustments, including elimination of grazing, are made. Monitoring use on properly located key areas should provide both the basis for identifying areas that are unsuitable for livestock grazing and for adjusting grazing, if needed. Also, refer to response 26-1, question #5.

168-9 Elk habitat management is addressed in the West Slope Habitat Management Plan. The plan establishes criteria for the management of many key wildlife species, including elk. These criteria will influence the development of other activity plans, including those for livestock grazing, forest management and recreation. Oil and gas exploration would be seasonally restricted on all elk winter and crucial winter range. Some elk habitat would be protected by "no surface occupancy" restrictions applied to protect other resource values. Activity plans developed for the various management programs will address these kinds of concerns, in detail. The level of detail needed to describe such things as specific locations of livestock waters or specific locations and patterns of prescribed burns is appropriate for detailed, site specific activity or project plans but not for a summary document such as the RMP/EIS.



Area Manager, WRA
28 February 1987

Page 6

21 Page xviii - Socioeconomics

Comment: What is the base in regional business activity? A percent change without a comparative base means nothing. Please correct or put dollar values so someone can relate to it. None of these altenatives is consistently comparable with another because there is no base for comparison.

22 Page 3 - Second Paragraph

Comment: This is confusing and difficult to interpret. Please reduce this to a simple table so readers can understand it? You should be aware of land ownership. The WRA occupies only a part of each county and these counties have other public land.

23 Page 5 - Step 3 - Inventory and Data Collection

Comment: There appears to be some major data gaps in this document. We feel that some of the decisions made in this document were not made with adequate supporting data or the data was not presented. If data is unavailable, the public has the right to know. In some cases decisions may have to be deferred until the data can be collected.

24 Page 16 - Third Paragraph

Comment: Add only to "Silvicultural . . . calving areas only if . . . "

25 Page 16 - First Paragraph after Table 3

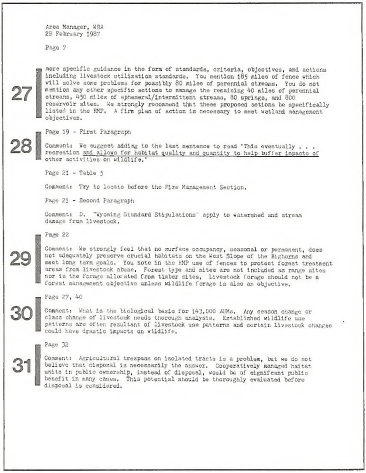
Comment: Authorized grazing use should be adjusted not only for the additional 300-500 acres taken out of production but also for the thousands of acres taken out of production in the past (i.e., oil fields, roads, bentonite mines, etc.). This has never been addressed and is significant in many grazing allotments. It is not logical to exclude existing oil fields, roads and mines from initial grazing adjustments as we cannot assume reclamation efforts to restore original productivity the day after disturbance, or perhaps in the foreseeable future.

26 Page 18 - Table 4

Comment: You note the possibility of adding more lands to the West Slope HMP. This table should have a column that identifies project needs to justify such an addition.

27 Page 18 - Wetlands

Comment: We are pleased with the strong stand the WRA has taken relative to proper wetland/riparian habitat. Wetland habitats are the most productive habitats that exist for wildlife and their importance cannot be overstated. However, other than the projected fencing needs by alternative there is no indication of specific practices, objectives, or criteria that would be implemented. We recognize that HMPs are to provide "side boards" for implementing activity plans and guiding daily operations. We feel strongly that the RMP should contain



Area Manager, WRA
28 February 1987

Page 7

27 more specific guidance in the form of standards, criteria, objectives, and actions including livestock utilization standards. You mention 185 miles of fence which will solve some problems for possibly 80 miles of perennial streams. You do not mention any other specific actions to manage the remaining 40 miles of perennial streams, 450 miles of ephemeral/intermittent streams, 80 springs, and 800 reservoir sites. We strongly recommend that these proposed actions be specifically listed in the RMP. A firm plan of action is necessary to meet wetland management objectives.

28 Page 19 - First Paragraph

Comment: We suggest adding to the last sentence to read "This eventually . . . recreation and allows for habitat quality and quantity to help buffer impacts of other activities on wildlife."

Page 21 - Table 5

Comment: Try to locate before the Fire Management Section.

Page 21 - Second Paragraph

Comment: D. "Wyoming Standard Stipulations" apply to watershed and stream damage from livestock.

29 Page 22

Comment: We strongly feel that no surface occupancy, seasonal or permanent, does not adequately preserve crucial habitats on the West Slope of the Bighorns and meet long term goals. You note in the RMP use of fences to protect forest treatment areas from livestock abuse. Forest type and sites are not included as range sites nor is the forage allocated from timber sites. Livestock forage should not be a forest management objective unless wildlife forage is also an objective.

30 Page 27, 40

Comment: What is the biological basis for 143,000 AUMs. Any season change or class change of livestock needs thorough analysis. Established wildlife use patterns are often resultant of livestock use patterns and certain livestock changes could have drastic impacts on wildlife.

31 Page 32

Comment: Agricultural trespass on isolated tracts is a problem, but we do not believe that disposal is necessarily the answer. Cooperatively managed haitat units in public ownership, instead of disposal, would be of signifcant public benefit in many cases. This potential should be thoroughly evaluated before disposal is considered.

168-10 In the discussion of Management Common to All Alternatives (page 18 of the Draft RMP/EIS) we indicate our intention to maintain and improve both wetland and upland habitats. Refer also to responses 146-5 and 64-23.

168-11 These comments, and those from BLM specialists, identify the need to clarify our intentions regarding the management of oil and gas exploration and development in sensitive wildlife habitat areas. Mitigations of impacts have been identified and changes in text made to better explain that management.

168-12 Management of habitats for sensitive or threatened and endangered (T&E) species is discussed in the Draft RMP/EIS (for example, on page 19). Management of habitats for T&E species and sensitive species would be in accordance with national recovery plan goals and guidelines or other guidance.

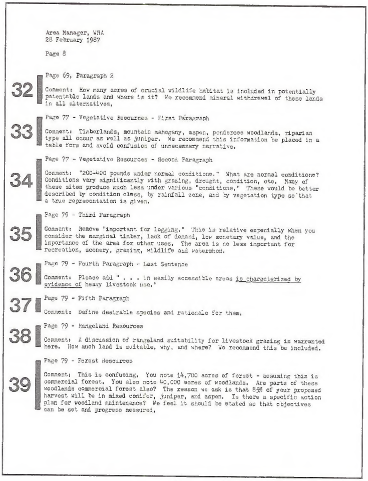
168-13 As part of an assessment of Tres Charros Cave, in 1979, it was determined that the cave contains a fauna which, for a northern climate, is both large and diverse, and may be of scientific interest. Other caves in the Washakie Resource Area have not been inventoried. The management of wildlife species is discussed in our current cave management plan and will be covered in greater detail in the revised cave management plan.

168-14 Our records show that mining claims have been located under the 1872 Mining Law on most, if not all, bentonite lands in the resource area, precluding those lands from withdrawal without lengthy validity determinations. Additionally, withdrawals greater than 5,000 acres must have Congressional approval. As a result of comments such as these regarding withdrawals and leasing closures, we have undertaken additional analysis of leasing versus no leasing. Refer to Appendix M of this document for that analysis.

168-15 All lands proposed for disposal would be reviewed in terms of the criteria listed in Appendix B of the Draft RMP/EIS. Those criteria include several related specifically to wildlife habitats. They also establish priorities for disposal and for the public purpose or public benefit that will result from such disposals.

168-16 That wording already exists in the narrative on page 16 of the Draft RMP/EIS. Table 1 has been modified to be consistent.

168-17 We have attempted to respond to this comment by defining these terms in the glossary and changing headings in the Final RMP/EIS. One of the major components of



Area Manager, WRA
28 February 1987

Page 8

32 Page 69, Paragraph 2

Comment: How many acres of crucial wildlife habitat is included in potentially patentable lands and where is it? We recommend mineral withdrawal of these lands in all alternatives.

33 Page 77 - Vegetative Resources - First Paragraph

Comment: Timberlands, mountain mahogany, aspen, ponderosa woodlands, riparian type all occur as well as juniper. We recommend this information be placed in a table form and avoid confusion of unnecessary narrative.

34 Page 77 - Vegetative Resources - Second Paragraph

Comment: "200-400 pounds under normal conditions." What are normal conditions? Conditions vary significantly with grazing, drought, condition, etc. Many of these sites produce much less under various "conditions." These would be better described by condition class, by rainfall zone, and by vegetation type so that a true representation is given.

35 Page 79 - Third Paragraph

Comment: Remove "important for logging." This is relative especially when you consider the marginal timber, lack of demand, low monetary value, and the importance of the area for other uses. The area is no less important for recreation, scenery, grazing, wildlife and watershed.

36 Page 79 - Fourth Paragraph - Last Sentence

Comment: Please add " . . . in easily accessible areas is characterized by evidence of heavy livestock use."

37 Page 79 - Fifth Paragraph

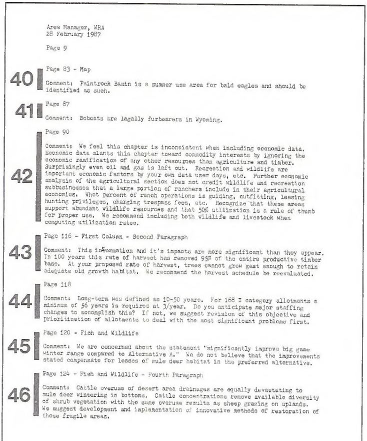
Comment: Define desirable species and rationale for them.

38 Page 79 - Rangeland Resources

Comment: A discussion of rangeland suitability for livestock grazing is warranted here. How much land is suitable, why, and where? We recommend this be included.

39 Page 79 - Forest Resources

Comment: This is confusing. You note 14,700 acres of forest - assuming this is commercial forest. You also note 40,000 acres of woodlands. Are parts of these woodlands commercial forest also? The reason we ask is that 85% of your proposed harvest will be in mixed conifer, juniper, and aspen. Is there a specific action plan for woodland maintenance? We feel it should be stated so that objectives can be set and progress measured.



Area Manager, WRA
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40 Page 83 - Map

Comment: Paintrock Basin is a summer use area for bald eagles and should be identified as such.

41 Page 87

Comment: Bobcats are legally furbearers in Wyoming.

42 Page 90

Comment: We feel this chapter is inconsistent when including economic data. Economic data slants this chapter toward commodity interests by ignoring the economic ramification of any other resources than agriculture and timber. Surprisingly even oil and gas is left out. Recreation and wildlife are important economic factors by your own data user days, etc. Further economic analysis of the agricultural section does not credit wildlife and recreation subbusinesses that a large portion of ranchers include in their agricultural economics. What percent of ranch operations is guiding, outfitting, leasing hunting privileges, charging trespass fees, etc. Recognize that these areas support abundant wildlife resources and that 50% utilization is a rule of thumb for proper use. We recommend including both wildlife and livestock when computing utilization rates.

43 Page 116 - First Column - Second Paragraph

Comment: This information and it's impacts are more significant than they appear. In 100 years this rate of harvest has removed 95% of the entire productive timber base. At your proposed rate of harvest, trees cannot grow gast enough to retain adequate old growth habitat. We recommend the harvest schedule be reevaluated.

44 Page 118

Comment: Long-term was defined as 10-50 years. For 168 I category allotments a minimum of 56 years is required at 3/year. Do you anticipate major staffing changes to accomplish this? If not, we suggest revision of this objective and prioritization of allotments to deal with the most significant problems first.

45 Page 120 - Fish and Wildlife

Comment: We are concerned about the statement "significantly improve big game winter range compared to Alternative A." We do not believe that the improvements stated compensate for losses of mule deer habitat in the preferred alternative.

46 Page 124 - Fish and Wildlife - Fourth Paragraph

Comment: Cattle overuse of desert area drainages are equally devastating to mule deer wintering in bottoms. Cattle concentrations remove available diversity of shrub vegetation with the same overuse results as sheep grazing on uplands. We suggest development and implementation of innovative methods of restoration of those fragile areas.

range management is livestock grazing. However, the RMP/EIS also addresses the management of soil, water, and vegetation, as well as uses of public rangelands.

168-18 There currently are about 600,000 acres in good or better ecological range condition in the planning area. This acreage must be increased by 360,000 acres to meet our goal of 960,000 acres in good or better condition. In some cases, only minor adjustments will be needed to improve range condition, while in others, intensive management will be required. We think that goal is realistic and can be attained within 50 years.

168-19 Prescribed burning is discussed as an impact to air quality on page 110 of the Draft RMP/EIS. We have modified Table 2 to include prescribed fire.

168-20 The intent of this comment is unclear, since there are no wildlife related tables in the Affected Environment Chapter in the Draft RMP/EIS. A comparison of impacts to wildlife habitat between Alternative A (current management) and the Preferred Alternative (Tables 28 and 33 in the Draft RMP/EIS) shows significant predicted reductions of impacts as a result of the Preferred Alternative: reductions in long-term abandonment, increases in slow and accelerated improvement, decreases in slow deterioration.

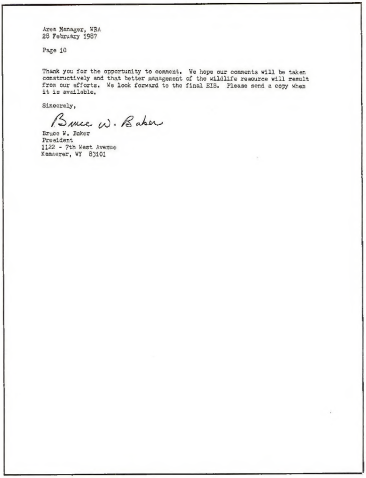
168-21 Because Table 2 is a summary, not every relevant piece of information is displayed there. A discussion of the economic and social situations is found in the Affected Environment, Chapter 3 in the Draft RMP/EIS. In the Draft, comparisons of the social and economic impacts of the alternatives, which are discussed in Chapter 4, are based on the data presented in Chapter 2.

168-22 We have modified the text to address the suggested change.

168-23 One of the constraints on development of the RMP/EIS was the necessity to use existing data; the opportunities for gathering new data were very limited. The impact analysis is based on the best available data, including the professional judgement of BLM specialists. The selection of the Preferred Alternative by BLM managers is based on that analysis.

168-24 Comment noted. The suggested word change is unnecessary because it does not change the meaning of the sentence.

168-25 The text on page 16 of the Draft RMP/EIS has been modified to include temporary adjustments for temporary uses. We have been, and will continue, making adjustments in grazing use to compensate for the loss of productive acreage.



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Thank you for the opportunity to comment. We hope our comments will be taken constructively and that better management of the wildlife resource will result from our efforts. We look forward to the final EIS. Please send a copy when it is available.

Sincerely,

Bruce W. Baker

Bruce W. Baker
President
1122 - 7th West Avenue
Kemmerer, WY 83101

168-26 The proposed expansion of the West Slope HMP is predicated on the documented need to manage additional public lands under the auspices of an HMP. The addition of those lands is not dependent on or justified by the need for projects. Any needed projects will be identified in updates of the HMP, in site specific plans, or in other activity plans.

168-27 Our commitment to manage wetlands to maintain and improve habitat condition is stated on page 18 of the Draft RMP/EIS. The 64 specific practices included in the West Slope HMP are among the methods to improve fish and wildlife habitat and to solve wetland problems. Because the RMP/EIS is a summary document, we listed only a few of the practices to give readers a basic understanding of the management options contained in the HMPs. The detailed data levels identified in the comment are contained in the HMPs.

Our major management emphasis would be the implementation of improved grazing treatments. Fencing would be used as a back-up measure to allow wetland/riparian habitat restoration or improvement. As indicated on page 18, some 170 reservoir sites have habitat which may receive management attention. Many of the 800 reservoirs in the resource area no longer hold water due to siltation or failure of dams. Reservoir management would emphasize water quality, extend longevity, reduce maintenance costs, improve watershed condition and provide fish and wildlife habitat. Intermittent/ephemeral desert drainages containing riparian vegetation would be managed to maintain and improve wetlands. Drainages with upland vegetation types would be managed to maintain vegetative and habitat diversity.

168-28 We have modified the text to address the suggested change.

168-29 Comment noted. Refer to Appendix M of this document for additional information on the "no surface occupancy" question.

Increased forage production for both wildlife and livestock is stated as a forest management objective on page 27 of the Draft RMP/EIS. We have clarified that point with a text revision, because forage production is an objective of vegetative manipulation on lands classified as woodlands rather than on lands classified as productive forest lands.

168-30 The use of the 143,000 AUM figure is based on inventories and allocations made in the mid-1960s. The figure is a baseline and any adjustment will be predicated on monitoring. Changes in season of use and kind of livestock are, and will continue to be, monitoring. Changes in season of use and kind of livestock are, and will continue to be, analyzed through the environmental analysis process. These changes should benefit vegetative resources, soil protection, wildlife habitat, and resolve livestock/wildlife spatial conflicts.

168-31 As indicated on page 13 of the Draft RMP/EIS, disposal of lands to resolve agricultural trespass is only an option, and each case would be reviewed based on its own merits. We are aware of other options for resolving those types of problems.

168-32 All public lands have the potential for disposal through patent. Refer also to response 168-14. There currently are about 47,000 acres of mining claims located on big game crucial winter ranges that could be patented and/or are being mined.

168-33 We have modified the text in response to the comment.

168-34 We have modified the text in response to the comment.

168-35 The text does not imply that logging is more important than other uses of the forest lands. However, these lands are important to the small logging industry in the Bighorn Basin.

168-36 We have modified the text in response to the comment.

168-37 A glossary reference has been added in response to this comment.

168-38 Comment noted. Refer to responses 26-1 (Issue #1, question #5) and 168-8.

168-39 Nearly 15,000 acres are in the timber production base (note the revision made in the text on page 79 of the Draft RMP/EIS). These are the lands where harvesting activities are proposed. The 40,000 acres of woodlands are not included in the timber production base and are not included in harvest calculations. Vegetative manipulation projects in woodlands will be proposed in activity plans, primarily HMPs and AMPs, to meet various resource objectives.

168-40 We have no documented record of use of Paint Rock Basin as summer bald eagle habitat. A substantial amount of the Paint Rock Basin is on the Bighorn National Forest.

168-41 We have modified the text in response to the comment.

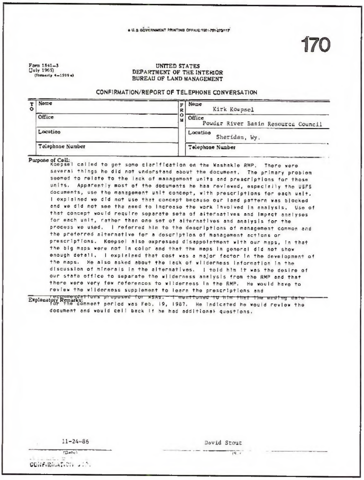
168-42 We are not certain of the intent of this comment, since the text on page 90 of the Draft RMP/EIS does not refer to economics. The economic impacts of each of the alternatives are discussed in Chapter 4, including discussions of economics related to mineral development, agriculture and recreation.

168-43 It is our intention under the Preferred Alternative to undertake silvicultural treatments on 100 percent of the timber production base during the 120 year rotation cycle. This does not mean a complete loss or alteration of the forest characteristics, because all age classes of trees will always be present in the forest. Additionally, vegetative treatments may be designed to enhance old growth rather than harvest it, and treatments could be designed to simulate old growth on segments of the forest. The types of treatments proposed will be developed in the forest management plan to address the resource management objectives of the RMP.

168-44 There are 205 "I" category allotments in the resource area. Correctly established priorities will allow us to address the most significant problem areas, first (see response 168-6). Although we anticipate working on an average of three AMPs a year, there undoubtedly are other "I" category allotments with problems that can be resolved through minor changes in existing uses. These allotments may not require an AMP and can be handled concurrently with the AMP workload. We expect many low priority "I" category allotments to fall into this group, since adjustments in season of use or kind of livestock may resolve current conflicts or problems.

168-45 Refer to response 168-20.

168-46 Mule deer and other species habitat in desert drainages would be managed according to guidelines developed in the RMP/EIS for wetland/riparian habitat management. Refer also to response 168-26.



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Form 1541-3
(July 1965)
(formerly 4-1599 a)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

CONFIRMATION/REPORT OF TELEPHONE CONVERSATION

TO	FROM
Name	Name Kirk Koepsel
Office	Office Powder River Basin Resource Council
Location	Location Sheridan, Wy.
Telephone Number	Telephone Number

Purpose of Call:

Koepsel called to get some clarification on the Washakie RMP. There were several things he did not understand about the document. The primary problem seemed to relate to the lack of management units and prescriptions for those units. Apparently most of the documents he has reviewed, especially the USFS documents, use the management unit concept, with prescriptions for each unit. I explained we did not use that concept because our land pattern was blocked and we did not see the need to increase the work involved in analysis. Use of that concept would require separate sets of alternatives and impact analyses for each unit, rather than one set of alternatives and analysis for the process we used. I referred him to the descriptions of management common and the preferred alternative for a description of management actions or prescriptions. Koepsel also expressed disappointment with our maps, in that the big maps were not in color and that the maps in general did not show enough detail. I explained that cost was a major factor in the development of the maps. He also asked about the lack of wilderness information in the discussion of minerals in the alternatives. I told him it was the desire of our state office to separate the wilderness analysis from the RMP and that there were very few references to wilderness in the RMP. He would have to review the wilderness supplement to learn the prescriptions and recommendations proposed for WSAs. I mentioned to him that the ending date for the comment period was Feb. 19, 1987. He indicated he would review the document and would call back if he had additional questions.

Explanatory Remarks:

11-24-86
(Date)

David Stout
(Signature)

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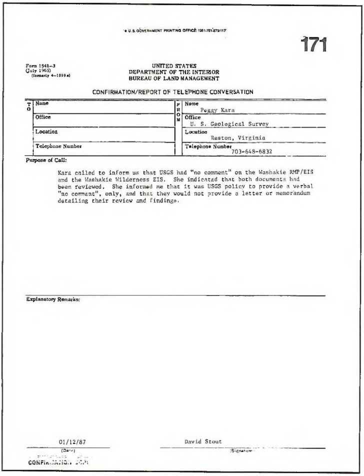

U.S. GOVERNMENT PRINTING OFFICE: 1981-781-273/117

171

Form 1541-3
(July 1965)
(formerly 4-1599 a)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

CONFIRMATION/REPORT OF TELEPHONE CONVERSATION

TO	FROM
Name	Name Peggy Kara
Office	Office U. S. Geological Survey
Location	Location Reston, Virginia
Telephone Number	Telephone Number 703-648-6832

Purpose of Call:

Kara called to inform us that USGS had "no comment" on the Washakie RMP/EIS and the Washakie Wilderness EIS. She indicated that both documents had been reviewed. She informed me that it was USGS policy to provide a verbal "no comment", only, and that they would not provide a letter or memorandum detailing their review and findings.

Explanatory Remarks:

01/12/87
(Date)

David Stout
(Signature)

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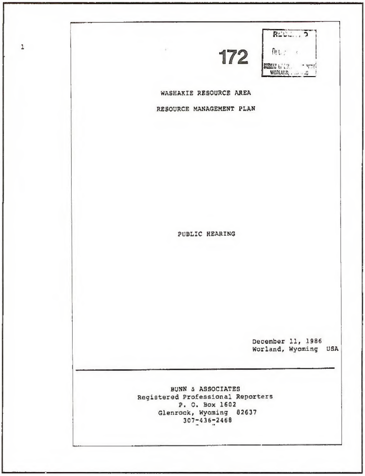

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WORLAND, [illegible]

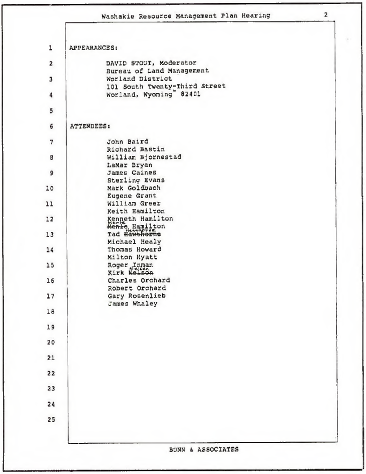
WASHAKIE RESOURCE AREA

RESOURCE MANAGEMENT PLAN

PUBLIC HEARING

December 11, 1986
Worland, Wyoming USA

BUNN & ASSOCIATES
Registered Professional Reporters
P. O. Box 1602
Glenrock, Wyoming 82637
307-436-2468



Washakie Resource Management Plan Hearing 2

APPEARANCES:

DAVID STOUT, Moderator
Bureau of Land Management
Worland District
101 South Twenty-Third Street
Worland, Wyoming 82401

ATTENDEES:

John Baird
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William Bjornestad
LaMar Bryan
James Caines
Sterling Evans
Mark Goldbach
Eugene Grant
William Greer
Keith Hamilton
Kenneth Hamilton
~~Menie~~ Merle Hamilton
Tad ~~Hawthorne~~ Heathorne
Michael Healy
Thomas Howard
Milton Hyatt
Roger Inman
Kirk ~~Nelson~~ Nielsen
Charles Orchard
Robert Orchard
Gary Rosenlieb
James Whaley

BUNN & ASSOCIATES

Response to questions raised at the Public Hearing on the Washakie RMP/EIS

172-1 Some confusion resulted from the discussion of impacts from both logging and livestock grazing in the section on vegetation in Table 2. Under Alternative B, for example, there is really no relationship between the impacts of logging and the improvement of range condition. The impacts from logging and livestock grazing should have been in separate paragraphs.

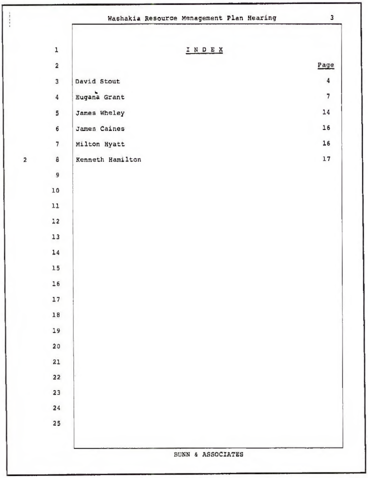
172-2 The estimates of acreages of wildlife habitats affected by various activities shown in Table 33 were based on levels of current use. Fairly accurate information exists on the location and extent of wildlife habitats. We have even more specific data on the size and location of surface uses such as logging and mining. Refer also to response 172-1.

172-3 The general locations of producing oil and gas wells in the planning area can be determined by referring to Map 9 in the Draft RMP/EIS. The producing wells are located in the Known Geologic Structures (KGSs). Map 9 should be compared with Map 8 to determine hydrocarbon potential. We have also added Appendix L, the "Future Development Scenario for Oil and Gas Based on Activity from April 1, 1976 to March 31, 1986", which arrays by hydrocarbon potential the wells drilled over a ten-year period.

172-4 In the text referenced, 12 of the 91 wells drilled were producers and all were in high potential areas. The twelve wells drilled in moderate potential areas and the three wells drill in areas of low potential were all dry holes, as stated in the text. We have modified the text to more clearly identify the status of the 12 producing wells and those that were dry and abandoned.

172-5 The Draft RMP/EIS, on page 16, indicates that reforestation would occur on areas not reestablished by natural regeneration and that conifer species would be used to supplement the natural regeneration. While the text does not list species, it may be inferred that the species harvested would be replanted. Table 21 on page 79 of the Draft lists the conifer species present on productive forest lands in the planning area.

172-6 The privately owned tract within the Alkali Creek Wilderness Study Area (WSA) has been identified in Appendix B as land suitable for consideration for acquisition. If the analyses of the Alkali Creek WSA show acquisition of the private inholding is desired (refer to the Draft Wilderness EIS), the BLM



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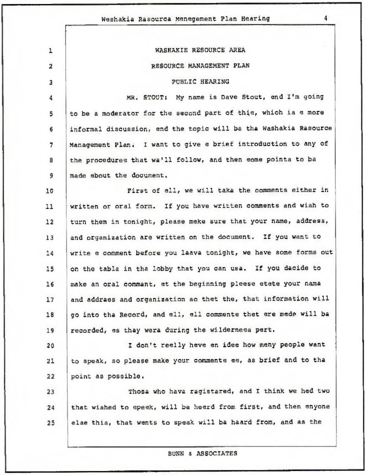

WASHAKIE RESOURCE AREA
RESOURCE MANAGEMENT PLAN
PUBLIC HEARING

MR. STOUT: My name is Dave Stout, and I'm going to be a moderator for the second part of this, which is a more informal discussion, and the topic will be the Washakie Resource Management Plan. I want to give a brief introduction to any of the procedures that we'll follow, and then some points to be made about the document.

First of all, we will take the comments either in written or oral form. If you have written comments and wish to turn them in tonight, please make sure that your name, address, and organization are written on the document. If you want to write a comment before you leave tonight, we have some forms out on the table in the lobby that you can use. If you decide to make an oral comment, at the beginning please state your name and address and organization so that the, that information will go into the Record, and all, all comments that are made will be recorded, as they were during the wilderness part.

I don't really have an idea how many people want to speak, so please make your comments as, as brief and to the point as possible.

Those who have registered, and I think we had two that wished to speak, will be heard from first, and then anyone else this, that wants to speak will be heard from, and as the

may initiate an exchange of lands in public ownership for those private lands in the WSA. The landowner may also propose an exchange of his lands for vacant public lands. In either situation, a detailed analysis of the proposed exchange would ensue. The criteria listed in Appendix B would be applicable in either situation.

172-7 The numbers quoted in the comment are thousands of acres of various wildlife habitats that would be affected by specific uses proposed in Alternative B.

172-8 Refer to response 127-5.

172-9 Refer to Appendix A of the Draft RMP/EIS.

172-10 A detailed explanation of the handling of the Classification and Multiple Act Use (C&MU) lands in Hot Springs County is found on page 10 of the Draft RMP/EIS.

172-11 Wild horses from the Washakie Resource Area could be transferred to the Fifteenmile Wild Horse Herd Management Area in the Grass Creek Resource Area or the McCullough Peaks Wild Horse Herd Management Area in the Cody Resource Area, if a transfer would help meet the management objectives for those areas.

172-12 As stated on page 16 of the Draft RMP/EIS, any adjustments in livestock grazing use would be made as a result of consultation with the grazing permittee, either because of new information developed through monitoring or because the permittee desired a change. A change in the class of livestock is only one of a number of possible actions that may be used to accomplish management objectives.

172-13 Definitions of riparian areas and wetlands are found in the Glossary. Map 26 in the Draft RMP/EIS identifies streams supporting wetland/riparian habitat. The 185 miles of fence proposed in the Draft would be funded from BLM programs or would be accomplished with donations of labor or materials, or a combination of all of these.

172-14 The restrictions on the chemical control of pests, including noxious weeds, presented on page 33 of the Draft RMP/EIS for the proposed Spanish Point Karst ACEC have been revised based on public comments. Refer to the Final EIS for a description of the practices suggested for the control of pests in the proposed ACEC.

Moderator I'll ask or identify who is to have the floor, so we'll try and keep some semblance of order.

I want to explain a little bit about the planning process in case you're not familiar with it. First thing to explain is that this Plan covers a portion of the Washakie Resource Area, and I say "a portion" because technically the boundaries of the Washakie Resource Area include portions of the Big Horn National Forest and the Wind River Indian Reservation down in the lower corner of the map here.

The planning unit that that document covers is public land managed by the Bureau of Land Management, and the boundaries, quickly, are Shell Creek, the Big Horn River, the Indian Reservation, and the County Lines of Fremont and Natrona County along the south, and the County Line of Natrona and Johnson on the east, and the forest boundary on the east, and so that's the area that we're studying in the RMP.

The BLM planning process is three-tiered. There's three different segments to it, and the first segment is one that we really don't have much input in, and that's the legislative process, which includes the writing of regulations based on legislation.

The second tier, or level, is resource management planning. That's where we are right now.

And, the third level is activity planning. I mention this because the document that you have got, the RMP, is a summary document. You have to realize that when you are, when you are reviewing it, to understand why things aren't necessarily specifically stated.

3 The Plan doesn't identify any action as for specific pieces of ground, and the purpose of the Plan is to provide general guidance for the third tier of the planning, which is activity planning, and activity plans are a lot like management plans, habitat management plans, recreation area management plans, those type of things, and in those Plans we will write specific actions for specific pieces of ground based on these general recommendations that are provided in the RMP.

Following the current 90-day comment period that we're in right now -- and was mentioned earlier, that period ends February nineteenth of '87 -- we will prepare a final RMP EIS, and if all goes well we'll have that ready for public review sometime next summer. Following that there will be a 30-day period for public comment, and then after that we'll prepare a Record of Decision and an approved Resource Management Plan, and we hope to have all of this completed by the end of September of '87.

After that we will begin implementation of the Plan, and implementation includes writing of the activity plans which will guide the specific uses of, of the public lands and resource area.

The meeting tonight is part of the public participation process, and there are a number of opportunities to, have been a number of opportunities for public input and participation in the development. A portion of Chapter 5 in that RMP document summarizes what has gone on to date in terms of the public participation, and we expect that you will want to provide us additional comments before the, the February deadline, and then also review the final when it comes out.

One final thing to mention. It is stated in the front of the document, but I'll reiterate it, and that is that you should retain these documents because there's a possibility that we will prepare an abbreviated final RMP, and if we do that you'll need this document to refer to in more detail, or whatever may be necessary. It kind of depends on what sorts of comments we get, and, and what we feel we need to do, so I'ld suggest that you hold onto that until the process is finished.

Now, the register disappeared, but, so I'll, if I can find out real quick --

MR. BASTIN: Sorry, Dave.

MR. STOUT: That's okay. Thanks.

Well, Mr. Grant has indicated that he would, would like to make a statement on the RMP.

So, feel free.

MR. GRANT: Okay, Eugene Grant with Marathon Oil Company. These are just general statements to be made in relation to the whole Plan, and also bring in the interest of miner-

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al exploration, or the possibility of mineral exploration.

1 Starting with the Summary of Facts in Table 2 on Page 13, looking at this through a, a hole here on our Resource Management Plan, a, if the forest that they're talking about here is losing 600,000 board feet of lumber per year to disease and decay and insects, and then I feel that the BLM really has no choice but to try and harvest the timber before it just rots or it dies off, because the statement is made further on here that if logging were to take place, it would increase the amount of range to about 50 percent to be in excellent condition.

They talk about the overgrazing in here of livestock, or "obviously due to livestock," but when you get right down on it, if the overgrazing caused by the horses, wild horses is as serious as is indicated, then I think that the Bureau of Land Management here would probably have no other option than to remove the biggest problem there is from the rangeland, which would be those horses.

One of the things that constantly is brought upon on the oil industry by Sierra Clubs and other groups, and we go into an area, is soil erosion, and here we have a group of animals out there that are classified as wild horses, and I don't know if any of them have brands on them or not, as some of the so-called wild horses, but if that is that big of a problem, and then something definitely has to be done there.

If you're going to be receptive to the rancher and allow grazing to take place, it would not really suit the rancher to have all that grass grazed off due to some horses out there that shouldn't be there in the first place, or maybe you don't want them there.

2 The statement is made under Alternative A that the minerals industry and the forest industry acts would effect the big game range and long-term abandonment of 12,000 acres of elk winter range, 12,000 of crucial winter range, 24,000 acres of elk winter range. I don't know how this statement could be that exact, particularly on the logging end of it, when before you said, "Hey, if we log this, we're going to increase the condition of the rangeland for grazing." Then you come down 'ere and say, "Gee, logging is going to wipe it out."

Being that I put myself through college logging, and used to see what was going on, the whole Plan here may have to be looked at a little bit closer as to where you're talking about select cutting or clear cutting, logging in a checkerboard arrangement or logging in a continuous arrangement on a select-cut basis to where, let's say the elk or deer, whatever, may not have the habitat that they need, but there is enough wildlife management research available now where I think that the ranchers can have the grazing that they want and the logging can benefit that, and the removal of wild horses, so the way we look at it on the management planning end of it, the preferred alternative and so forth, should be pursued by the Bureau of Land

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Management.

Okay, on Page 1, the, the numeral I, or number I, it talks about, in Paragraph 3, the purpose and need of a Resource Management Plan. One thing I'ld like to point out here is the multi-purpose use concept. Drove down the street today in Worland and I remember what it was like four years ago, and this also impacts the area around here of Thermopolis, you know, so carry it on up into Lovell and Powell and the area up in there, and it has to do with minerals.

Okay, on the oil exploration end of it, if the exploration was back here as it was a few years ago, you all know the, you all know the positive benefits. The negative benefits everybody will be seeing soon in the term of tax revenue, school budget, Federal budget, and so forth. To go after minerals, it is a positive benefit not only to this community, but to the people of the United States to pursue drilling the unknown areas of this country hopefully to find some of the oil or petroleum products that are down there.

It is interesting to note that the assumptions or the manner in which assumptions are made, and I'll find it shortly, when they talk about the number of wildcat wells that are drilled, the number of dry holes, but they failed to mention the number of producing wells.

In a Resource Management Plan such as that in a wilderness study area, we go drill dry holes based on where a

3 possible trap could exist for the purpose of locking in these hydrocarbons. One thing that was not mentioned in here was the areas where gas was found, or oil. Were they in areas that were classified as high potential, low potential, moderate potential? That is not, that statement is not made in here.

On Page 12 it talks about contingency plans for the release of hydrogen sulfide gas, and how it's, let's say, going to be controlled, or countermeasures to control the release. One thing that should be pointed out in here are the current regulations that already exist. When it comes to a Drilling Application, the stipulations for hydrogen sulfide gas, blowout preventers and so forth, this is standard operating procedure. This is not something that's new, and should not be presented as something like, "Gee, it's a brand new idea. We ought to look at it." This has already been taken into consideration.

This went into consideration under NTL-1, and is also under the rules and regulations as the Field On-Shore Operating Order Number 1, and we are extremely aware of it, and maybe that is indicated. In taking a look at any of the drilling applications that come out of this Worland Office in the Washakie Resource Area, should be aware that the, those are there to protect the people and protect the environment.

Even in a wildcat issue, the North Fork, that is so far away from anybody, that is on record of all the steps

that were taken to care for the hydrogen sulfide, so it's really nothing new in this part of Wyoming. Sour crude, which contains H2S, is quite common.

Okay, on Page 96 is, that's what I was trying to get at before. This is what some of the environmental groups use as facts, like so many wells are going to be drilled. They take numbers, and here it talks about 150 APDs for wildcat wells were applied for. That means a Drilling Application. Not all the wells that are applied for and approved are drilled.

5 You have to get the approval. Once you obtain the approval, you take a look at the stipulations that are attached to that approval. The stipulations in some cases are a little prohibitive, so if a well is on the economic borders of whether or not we're going to drill it, the stipulations may be such that we will probably back off on it until another time, or back off on it altogether.

4 In here, out of 158 APDs ~~APBs~~ applied for, 91 wells were drilled. Of those, 79 were dry and abandoned, and then what happens to the other 12? It says 12 of the wildcat wells were drilled with the area considered to have moderate potential for oil and gas. Now, the difference between 79 and 91, that is 12. Are the 12 wells they were talking about here 12 more dry holes, or are these 12 producers? We think that that has to be clarified in the way it's written there.

Okay, on Page 98, when it gets back to the timber that was done, what can be developed in the resource area for optimum range and grass growth, if this is what can be done and still protect the wildlife and the resource in the area, and then we would have to agree with the Bureau of Land Management. They would have really no option but to go ahead and try to pursue that on the multi-purpose use type of approach.

Okay, on Page 141, when they go in those areas here, like Alternative D, it's extremely restrictive for minerals and other use, but favora timbering. In something like this, we realize with guys in there cutting and skidding timber you'll have a little soil erosion. You'll have a little noise, but I guarantee you, as soon as you move out, what wildlife there is in there will move back in. I've seen that happen too many times when I was working in there logging.

5

If it is going to be, if timber is going to be allowed, or timbering, they think why shouldn't some of the other uses such as grazing and mineral uses also be pursued? We don't think that that would be any more detrimental than logging, but again, in a lot of this stuff it does not state what type of logging would take place. It talks about the different typea of native timber up there, but is this the type of timber that you want in the area? Do you want the lodge pole or the spruce or whatever it is? It may be necessary to clearcut it and go in and plant the tree species that would be most desireable in this area. I don't know through reading this what is the most pre-

5 ferred type of tree up in that area.

Okay, on Page 161, this has to do with the private land into Beech Creek. Again, I do not know what as being restricted or what is not being restricted up there. If it is an area where a tremendous amount of land is being tied up because there's no public access, well, then there is a problem. If it's five or ten acres you're looking at, I would say there is no problem.

We have to respect the rights of the rancher, and sometimes when you have an access through the property it's rather difficult to make sure that everybody using that access is going to respect the rights of the rancher. It isn't always possible to get what we want through there, but I would like the multiple purpose use concept to at least be considered.

Okay, overall that's about the sum of what I have to say.

MR. STOUT: Thank you.

Does anyone else wish to make a statement at this time?

MR. WHALEY: I would just like, I'ld like to make a, an observation, if I might. I'm happy to notice in your Summary of Allotment Conditions and Authorized Use, as it starts back here I think on about Page 172 and continues on the various allotments throughout the, the resource management area, it hadn't been but a few years ago, and I know this to be a fact, having sat upon the Advisory Boards here for a good many years, that at one time there wae an awful lot of this land that was classified as being in poor condition. There was always a bone of contention between the Advisory Board members and the Bureau, itself, that there was the Bureau claiming that a lot of this was in poor condition.

I think there wae one reason for this: The Bureau, feeling if they could tell Congress in their budgeting process that they had a lot of land in poor condition, that it would cause the Congress to loosen the purse strings and throw a lot more money into the management of our western resource.

6 However, after 50 years, that thing sort of turned around and bit them, becauae Congress, looking at this, saying, "If, in 50 years, you have not increased these lands and their productivity, there's something wrong with the management," and I think that the local Bureau has begun to understand this, and in reevaluating this, I think that you have a much more favorable ratio of good, excellent, and fair conditions than was prevalent here a few years ago, with very little difference in management, so I just wanted to make that statement. I can't help but feel that somehow or other this agency was kind of caught in their own trap.

MR. STOUT: Thank you.

Anyone else?

MR. CAINES: Yeah, I'ld like to.

MR. STOUT: Can you tell us your name?

6 MR. CAINES: My name is Jim Caines, and I'm concerned with the areas in the, the northern part, the, the Alkali Area and the Trapper Creek area and the Medicine Lodge area, all three. Although I, I see I've been left off these ranching and grazing interests here, you, the Alkali proposed area does surround some land, and I have read in here that the, the, that I would be able to acquire land as they, or if you were to condemn this, and buy it. What's the, the procedure?

MR. STOUT: Well, I think that's something that we can explain to you after, after this. You're talking about the Wilderness Study Area, I presume.

MR. CAINES: Right. Uh-huh. Uh-huh, where private land is, or where BLM is surrounded by private land, and if it, it were to be acquired.

MR. STOUT: If you don't mind, we'll defer that for a few minutes and get to other witnesses and --

Mr. Hyatt?

7 MR. HYATT: I have a comment in reference to Page 133, big game habitat, whatever it would be. I go down here and it says, "Cause of Impact." Says, "Livestock," and then it goes over, says three antelope and 68 deer and 23 elk. Then you go all the way down to winter rage, summer range, year-long habitat, elk calving ground, elk, spring, fall, running habitat. I know I'm not going to ask for an anewer, but those things per-

turb me. They're not self-explanatory.

8 Then you turn to Page 130, estimated loss range in soil loss. The question goes through my mind, I'm going not to go into, if you take the recreation use, range management, and minerals on up, where did you have a figure to start with, what the depth of soil was before you tabulated these great losses of soil over the period of years? The BLM's only been in effect for, say, 50 years, but you go on down to, and it's due to different uses, and that's all I have to say, but --

MR. STOUT: Okay, we can maybe give you an explanation in a few minutes.

Anybody else?

MR. K. HAMILTON: Mr. Chairman, my name is Ken Hamilton. I'm with the Wyoming Farm Bureau Federation. I haven't had a chance to read all of this Resource Management Plan, so some of my comments may be, or questions may be answered later on. I also would like to, at a later date, comment on a written, in written comment, but I have some questions here.

9 First, starting with, on Page 21, you mention that streams in the west slope canyons will be managed to prevent watershed deterioration and sedimentation of these ~~pristene~~ pristine streams. They'll be managed according to the Wyoming standard stipulations for surface disturbing activities. I'm a bit dense, I guess. I don't quite know what those are. I'ld like to have those explained as to what that will entail.

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10 Also, on Page 25 you, you mention that classification, multiple use act, retention, and disposal of approximately 144,500 acres in Hot Springs County would be terminated. I don't know why. I'ld like to have that question answered just out of curiosity.

11 On Page 27 you mention that the wild horses in the Zimmerman Springs area will be removed and either put up for BLM's adopt-a-horse program, or be relocated to a designated, designated wild horse herd management area in the Worland District. I haven't been able to find out what that area is, and I'ld also like to have that identified.

On that same page, under Range Management, under your Preferred Alternatives, you mention that some of the changes that may be needed or made is change in class of livestock. This is all very well when you write down, but when the actual implementation of it comes you have several questions arise, and, and more notably I would address what happens when you change from cattle to sheep.

7

A lot of times, the reason a permittee goes out of scheme is because of the predator problem or because of the management problem, fences. 12 If you would be able to fence with a BLM-prescribed fence, which I believe is three barbed wire and is not sheep-tight, will not keep the sheep in, so I'ld like to know how the BLM intends to change class of livestock, and if they do, how they intend to do it without, or without adversely

12 affecting anyone, and also make it more, making it easier for sheep people to, to operate on all Federal range.

13 Page 28 mentions about 165 miles of fence would be built around wetland/~~repairing~~ riparian areas. I have a problem with the word "~~repairing~~ riparian area" every time I hear it, because it hasn't been adequately defined in a lot of situations, but who pays for the fence? And, also, I would like to know where these ~~repairing~~ riparian areas would be. Have they been identified yet, and if so, I'ld like to know if I could get a copy of, of these.

14 Page 32 and Page 33 we have mention of the areas of critical environmental concern, and most specifically it has to do with the Spanish Point Karst Area. I feel again, as has been mentioned before, there needs to be some care in these areas, but you mention in that that use of insecticides, herbicides and ~~sylvaculture~~ silviculture chemicals would be prohibited. I would like to know how the BLM, or if the BLM plans on controlling noxious weeds.

Always, you know, the State of Wyoming has laws that will require private landowners to control noxious weeds on their land, and if they happened to be adjacent to a BLM area that is not controlling these noxious weeds, they continually are infested by them. They're continually having to go put out money to control noxious weeds. I think there needs to be some flexibility perhaps in this, and I think maybe some rules or regulations or whatever need to be drawn up that would allow at

least some chemical controlling of noxious weeds.

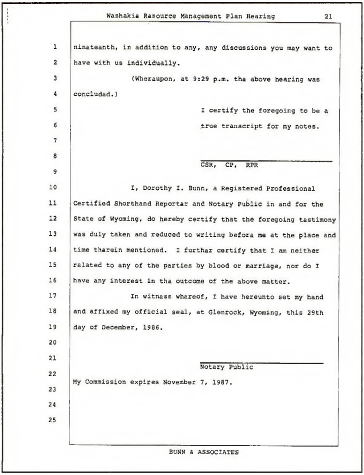
I believe that's all the comments I have at this time, Mr. Chairman. Thank you.

MR. STOUT: Thank you.

Anyone else care to make a comment? Okay, at this point let me mention which of the BLM staff are here, and perhaps suggest that they could answer some of these questions, if that's all right with everybody.

Kind of put you on the spot. Mark, of course, can discuss anything related to wilderness. Roger Inman, Area Manager here, and could answer some questions perhaps about range. I'ld be glad to try and answer questions concerning the Classification Multi-Use Act, that sort of thing. Gary Rosenlieb, in the corner, is a hydrologist, and he can discuss the Karst area and that sort of thing, and at this point there's no more need to be formal and we can be informal and go ahead and get inquiries answered and so forth, and thank you very much for spending your time to come out tonight.

MR. BASTIN: I just want to mention that what we'll try and do in this final version of this RMP is, your statements that you have made tonight have been recorded. We will look at those statements and respond to those specific statements in the final document. You'll see a specific response to those statements, as well as any, any letters or comments that you may send to us between now and, and February



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nineteenth, in addition to any, any discussions you may want to have with us individually.

(Whereupon, at 9:29 p.m. the above hearing was concluded.)

I certify the foregoing to be a true transcript for my notes.

CSR, CP, RPR

I, Dorothy I. Bunn, a Registered Professional Certified Shorthand Reporter and Notary Public in and for the State of Wyoming, do hereby certify that the foregoing testimony was duly taken and reduced to writing before me at the place and time therein mentioned. I further certify that I am neither related to any of the parties by blood or marriage, nor do I have any interest in the outcome of the above matter.

In witness whereof, I have hereunto set my hand and affixed my official seal, at Glenrock, Wyoming, this 29th day of December, 1986.

Notary Public

My Commission expires November 7, 1987.

BUNN & ASSOCIATES

Table 47 lists the changes made in the text of the Draft RMP/EIS. These changes resulted from comments made by the public and from review by BLM specialists. The changes are organized by page, column, paragraph and line and are highlighted with darker printing. When reviewing portions of the RMP/EIS not reprinted, the reader should use Table 47 with the Draft RMP/EIS.

TABLE 47

TEXT CHANGES

Page	Column	Paragraph	Line	Should Be:
iii	3	1	6-13	. . . about **7 percent would be leased with a "no surface occupancy" stipulation and another 60 percent would be leased with a seasonal "no surface disturbance" stipulation. Less than 1 percent would be closed to leasing.**
iii	6	1	5-14	. . . leased with a **"no surface occupancy" stipulation. About 52 percent would be leased with a seasonal "no surface disturbance" stipulation, and 32 percent would be leased with other standard surface protection stipulations.**
iii	7	1	6-12	. . . leased with a **"no surface occupancy" stipulation and the remaining 50 percent would be leased with other standard surface protection stipulations.**
iv	1	3		Replace with: **To protect wildlife habitat, fuelwood would not be harvested in riparian areas along low-lying ephemeral streams. Cottonwood would be protected for wildlife needs and would not be sold for fuelwood.**
iv	2	4	5	. . . watershed, **wildlife,** or wetland/riparian . . .
iv	3	1	9	. . . areas and **388,000** acres . . .
iv	5	3	1	Same as **the Preferred Alternative**
ix	3	4		Replace with: **To aid in the protection of crucial habitats, vehicle, horseback, and pedestrian access would be limited.**
v	1	3	1	Range **and Livestock Grazing** Management
v	2	3	1-3	**All "I" and "M" category allotments and some "C" category allotments would be monitored.**
v	3	2	5	. . . the **Resource** Area's . . .
vi	1	1	1	Range **and Livestock Grazing** Management
vi	2	2	1,2	**All** range project **proposals** would . . .
vi	3	5	4	. . . be made **after monitoring** to . . .
vi	5	1	4	. . . new AMPs**,** grazing systems . . .
vii	1	1	1	Range **and Livestock Grazing** Management
vii	6	insert new paragraph after 2		**Same as the Preferred Alternative**
viii	2	3	1	**Recreational** use . . .
viii	3	3	3	. . . designated; one . . .
viii	3	3	6	. . . acres; another . . .
xi	2	3	1	**Full** suppression . . .
xi	3	2	8,9	. . . Fork **Nowater creek** drainages . . .
xii	2	1	1	. . . development **land** and . . .
xii	3	1	2,3	. . . more **prescribed burning,** timber slash . . .
xiii	3	1	15	Begin a new paragraph after **MBF/yr.**
xiii	3	1	22	Begin a new paragraph after **unclassified.**
xv	3	3	4	. . . range **developments** would . . .
xv	6	3	2	. . . Alternative A**, but at about half the rate.**
003	1	1	4-8	. . . under BLM management. **About 63 percent of the area shown on Map 1 is public land. In the planning area, there are about 370,000 acres of BLM administered public lands in Big Horn County, about 691,000 acres of public lands in Washakie county, and about 173,000 acres of public land in Hot Springs County.** The public . . .
003	2	4	3	. . . elevation zone (**mean sea level**), the . . .
006	2	6	3	. . . to provide for **wetland habitat maintenance and improvement and for** big game . . .

TABLE 47 (Continued)

TEXT CHANGES

Page	Column	Paragraph	Line	Should Be:
007	1	4		Replace with: **What vegetative uses and management practices can be allowed on wetland/riparian/aquatic areas, and still allow maintenance and improvement of habitat conditions?**
009	1	5	1	. . . maintain **and** improve . . .
009	1	10	1	All alternatives should provide for maintaining **or improving existing water quality to meet current standards while allowing other resource uses.**
011	2	2		Replace with: **Leasable minerals in the resource area are oil, gas, coal, tar sand, and oil shale. Only oil, gas and tar sand are addressed in detail.**
011	2	3	1-3	Replace with: **All public lands would be open for consideration for the exploration and development of oil and gas except those closed to leasing.**
012	1	2	2	. . . an additional 5,100 acres in the **same general area** were issued . . .
012	1	2	4	As a result, **if any** tar sand deposits exist . . .
012	1	2	6	. . . area, **they could** be developed . . .
012	1	2	8	. . . assumed that **any** tar sand . . .
012	1	2	11-13	. . . leases held by **virtue of** production on the expiration date . . .
012	1	partial	3,4	. . . reasonable and necessary **conditions of approval would be applied to APDs and Sundry Notices to protect other resource uses and values, consistent** with the . . .
012	1	partial	13	Add: . .**In the event exploration activities result in producing oil or gas wells, specific mitigation requirements for surface resource values would be developed, based on environmental analyses of plans of operation or development.**
012	2	1	1-4	Replace with: **The Washakie Resource Area is not within a designated coal production region. Federal coal** . . .
012	2	1	5	. . . leasing **would thus** be considered . . .
012	2	1,2		Replace with: **The Washakie Resource Area is not within a designated coal production region. Federal coal leasing would be considered apart from the competitive leasing process set out in 43 CFR 3420.3 through 3420.5-2. This is essentially done on a case-by-case basis, called "Leasing on Application", under the appropriate provisions of 43 CFR 3425 (note that the sale and issuance of federal coal leases under these provisions is still done through a competitive bidding process).**
012	2	2		delete
012	2	3	2	. . . mineral entry **would be** open for . . .
012	2	3	10	. . . **withdrawn from mineral entry.**
013	1	1	1	Approximately **76,500** acres . . .
013	1	1	3	. . . protect **other** resources . . .
013	1	1	3	Add: **Protected from all forms of mineral entry are the Castle Gardens Campground (110 acres) and the Bates Battlefield (1040 acres). Approximately 60,350 acres in stock driveways and about 3,400 acres in public water reserves are withdrawn from the location of non-metaliferous minerals. Approximately 11,200 acres in the proposed Spanish Point Karst ACEC are pending withdrawal.**
013	1	1	7	Add: **Descriptions of the withdrawn tracts are provided in Appendix N. Refer to Appendix G in the Draft RMP/EIS for a description of the tracts pending withdrawal.**
013	1	4	2	. . . fourteen known sites **totalling an estimated 150 acres,** would be protected . . .
013	1	partial	4,5	. . .undue degradation of **other** resources . . .
013	1	partial	9,10	. . .**on a very small scale.**
013	2	1	8-10	Replace with: **Areas having tracts which may have potential for disposal are shown on Map 4.**
013	2	1	15	Add: **Future proposals for disposal of lands not listed or identified to date would also be considered on a case-by-case basis.**

TABLE 47 (Continued)

TEXT CHANGES

Page	Column	Paragraph	Line	Should Be:
013	2	2		Replace with: **In situations of agricultural trespass, the lands may be restored to the condition that existed before the trespass occurred. Or, the unique qualities of the land involved may present some opportunities for sale or exchange. Each situation would be reviewed on a case-by-case basis according to the criteria listed in Appendix B.**
013	2	3		Replace with: **Acquistion of non-BLM administered lands or interests in lands would be considered on a case-by-case basis to achieve management objectives. Acquisition by the BLM would entail methods such as exchanges or obtaining easements. Parcels that may be suitable for BLM consideration for acquisition are listed in this document, in Appendix B.**
015	Map 5			Refer to the revised map in this document.
016	1	1	2	. . . withdrawn under **Executive Orders** and other classification orders. . .
016	1	2	1-3	. . . riparian areas **unless conducted to improve fish and** wildlife habitat.
016	1	2	3	Cottonwood **would be protected for wildlife needs and** would not be sold . . .
016	1	3	3	. . . a manner that would **protect and benefit** watershed, wildlife, **and** wetland/riparian habitat.
016	1	5	1,2	**A precommercial thinning backlog on 450 acres of commercial forest land** would be eliminated . . .
016	1	6	1,2	**A reforestation backlog on 200 acres of unstocked forest land** would be eliminated . . .
016	1	7	5	All "I" **and "M"** category allotments . . .
016	1	7	6	. . . **category allotments and allotment management plans** . . .
016	1	7	8	. . . **may occur in "C" category** . . .
016	1	insert new paragraph after 6		**The West Slope Forest Management Plan would be developed, based on a comprehensive review of all forest related resource needs.**
016	1	insert new paragraph after 3		**Slash resulting from timber harvesting would be lopped and scattered, roller chopped, or burned to provide watershed protection, nutrient recycling and wildlife habitat improvement.**
016	2	2	1	. . . would be **permanently or temporarily** adjusted . . .
016	2	2	4	. . . permanent **or temporary** uses.
016	2	2	4	. . . permanent **or temporary** uses.
016	2	4	1	**Access on the South Trapper Rim,** South Brokenback . . .
016	2	5	1,2	. . . range projects **proposed** would first be subjected . . .
016	2	5	7-10	. . . would be designed **to meet allotment management objectives and** to be multiple-use . . .
016	2	5	10	. . . resource values. **Private contributions of labor, materials, and/or funds would be encouraged on all projects.** Specifications . . .
016	2	insert new paragraph after 2		**Where appropriate, the BLM would assist the Wyoming Game and Fish Department in accomplishing the department's management objectives for wildlife habitat management units and other important habitats. Actions that may be employed include habitat improvement projects, reducing or eliminating livestock grazing, or other practices that would help meet management objectives and enhance the quality of these habitats.**
016	2	partial	4	. . . grazing permittees **and other affected interests.**
016	2	partial	4,5	. . . **would be continued following adjustments** . . .
017	1	2		Replace with: **The Paint Rock Canyon area contains important cultural resources. A cultural resource management plan would be prepared to guide management of the area. The area would be nominated for inclusion in the National Register of Historic Places.**
017	1	2	1-3	Replace with: **Protective measures would be implemented on at least 15 known important sites, in accordance with the procedures and processes identified in Appendix O.**
017	1	3	2	. . . known sites **totalling about 750 acres**, would be protected . . .

TABLE 47 (Continued)

TEXT CHANGES

Page	Column	Paragraph	Line	Should Be:
017	1	4		Replace the entire Wilderness section with: **Recommendations for designation or non-designation of Wilderness Study Areas (WSAs) as wilderness will be submitted to Congress through the Director of the Bureau of Land Management, the Secretary of the Interior and the President. Whatever wilderness decision is made by Congress will be made a part of the RMP. The detailed analyses and management prescriptions related to the WSAs are in the Draft Washakie Wilderness EIS (the supplement to the Draft Washakie RMP/EIS).**
017	1	insert after first heading		**Resource Management Objective** **Refer to the management objectives described in Appendix O.** **Management Action**
017	2	4		Replace with: **Opportunities for recreational access would be emphasized, especially in the Laddie Creek, Medicine Lodge Creek, Paint Rock Creek and Upper Nowood River areas.**
018	1	6		Replace with: **The West Slope and Bighorn River Habitat Management Plans would be fully implemented. The projects listed in Table 5 are those identified in the plans. As these plans are completed or modified, or as management objectives change, the numbers and kinds of projects proposed are also likely to change. The projects in Table 5 are indicative of the types of projects that would be undertaken in the future as part of wildlife habitat management.**
018	1	7	2	. . . and improve **fish and wildlife habitat through the** implementation . . .
018	1	insert new paragraph after 4		**An analysis would be conducted of the existing BLM authorized outfitter/guide activities to evaluate the need for establishing future commercial use limitations and related policy.**
018	1	insert new title, headings and paragraph after 4		**Visual Resource Management** **Resource Management Objective** **To minimize adverse visual impacts to the land while maintaining the effectiveness of land use allocations.** **Management Actions** **Visual Resource Management (VRM) objectives would be considered in the evaluation of all proposals for activities on the public lands in the planning area. Impacts to visual resources would be mitigated through the application of the Wyoming BLM Standard Oil and Gas Lease Stipulations or by mitigations developed through the environmental analysis process. Refer to Table 21.1 and Map 31.1 in this document and the Glossary in the Draft RMP/EIS for details on VRM classes.**
018	2	1	3	. . . negative impacts, **land tenure adjustments,** and by . . .
018	2	1	list	Add: **—Easement acquisition,**
018	2	1	9	. . . range condition; **withdrawing public land tracts from mineral or other entry;** increasing animal . . .
018	2	1	10	. . . controlling access; **restricting oil and gas exploration and development in important habitat areas;** designating seasons . . .
018	2	1	list	Add: **—Withdrawals from mineral entry, agricultural entry and disposal,** **—Use of surface protection mitigations,**
018	2	2	5	Replace with: **The improvement of existing habitat quality does not include an allocation of forage to wildlife. Allocations of forage to wildlife would be made on a case-by-case basis. An increase in habitat quality would be reflected first in healthier wildlife populations and then in increased numbers of wildlife. This eventually translates into more animals and more opportunities for wildlife-related recreation and helps buffer impacts of other activities on wildlife.**
018	2	2		Replace with: **The improvement of existing habitat quality does not include an allocation of forage to wildlife. Allocations of forage to wildlife would not be made until monitoring of livestock grazing has been conducted. An increase in habitat quality would be reflected first in healthier wildlife populations and then in increased numbers of wildlife. This eventually translates into more animals and more opportunities for wildlife-related recreation and helps buffer impacts of other activities on wildlife.**
018	2	partial	1-3	. . . fencing, **using buffer zones, and installing structures to control water levels and prevent siltation.** Habitat . . .
019	1	1	12	**Some of the** . . .
019	1	1	12	. . . in Chapter 3 **of the Draft RMP/EIS).**

TABLE 47 (Continued)

TEXT CHANGES

Page	Column	Paragraph	Line	Should Be:
019	1	insert after heading		**Resource Management Objective** **To protect the habitats of threatened and endangered fish and wildlife species to allow the reintroduction or maintenance of populations.**
019	1	insert new paragraph before 2		**Soil and water management rely on existing surface protection stipulations and mitigations which are applied to all proposals for resource use activities. Soil scientists and hydrologists recommend supplemental stipulations for unusual disturbances or special site conditions, and recommend site suitabilities for resource uses, based on soils and water quality data.**
019	2	1	1	**Discharges of hazardous materials would be reported to appropriate agencies. These discharges and other** regulated hazardous wastes . . .
019	2	2	8	. . . of the RMP, the **proposed** Spanish Point. . .
020	Map 7			Refer to the revised **map** in this document.
021	1	1	5	. . . maintain their natural **flows.**
021	1	1	7	. . . **of these stream systems. . .**
021	1	1	6-9	Replace with: **The Wyoming BLM Standard Oil and Gas Lease Stipulations would be used as the basis for determining restrictions to be applied to activities, to prevent watershed deterioriation and sedimentation of these stream systems.**
021	1	6	7	Add: **The BLM would also apply to the State Engineer's Office for temporary water use permits.**
021	1	7	1	. . . soil stabilization **practices** would be applied . . .
021	1	7	4	. . . methods as fencing **or resting from livestock grazing.**
021	1	partial	1	. . . an ACEC, to **emphasize** the need . . .
021	1	partial	5	. . . boundaries of the **proposed** ACEC are . . .
021	1	partial	6,7	**The ACEC designation would pertain only** to the surface and . . .
021	2	1	1	**Full** suppression of wildfires**, with appropriate restrictions,** would occur . . .
021	Table 5			Refer to the revised table in this document.
022	1	1	2,3	. . . BLM **Standard Oil and Gas Lease Stipulations,** or future. . .
022	1	1	4-7	Delete: **Additional stipulations may be applied at the time of leasing to mitigate impacts not covered by the Wyoming BLM standard stipulations** . . .
022	2	1	3,4	. . . with a **"no surface occupancy" restriction** to . . .
022	2	1	4	. . . **for a Recreation and Public Purposes** patent.
022	2	1	1	**—Approximately 117,800 acres (7** percent of the . . .
022	2	2	1	**—Approximately 953,500 acres (60** percent of the . . .
022	2	2	3,4	. . . with **seasonal restrictions** to protect . . .
022	2	3	1	Approximately **520,500** acres . . .
022	Table 6			Refer to the revised table in this document.
023	Map 8			Refer to the revised map in this document.
024	1	1	5	. . . Wyoming BLM Standard **Oil and Gas Lease Stipulations** (or future . . .
024	1	partial	1,2	. . . surface protection **restrictions** applied.
024	2	partial	4,5	. . . species **nesting areas** and . . .
024	2	partial	10,11	. . . vehicle use limitations **and surface protection restrictions of various kinds.** (Table 2).
024	Table 7			Refer to the revised table in this document.

TABLE 47 (Continued)

TEXT CHANGES

Page	Column	Paragraph	Line	Should Be:
025	1	1	4,5	. . . acres **near the proposed** Spanish Point Karst **ACEC** which were leased . . .
025	1	1	13	. . . affect the **proposed** Spanish Point . . .
025	1	1	7,8	. . . tar sands**, other than the known Trapper Canyon deposit, are possible but unlikely** in those . . .
025	1	1	9	. . . with those leases, **any** tar sands cannot . . .
025	1	1	12	. . . pre-CHLA **leases** that would . . .
025	1	2	1,2	**Approximately 1,400 of the acres in post-CHLA leases affect the proposed ACEC. Those leases or portions of leases within the proposed ACEC would not be re-leased if, in fact, they** expired . . .
025	1	6	7	. . . would total about **395,000** acres . . .
025	1	6	5	. . . species **nesting areas** would . . .
025	1	6	7	. . . about **388,500** . . .
025	1	insert new paragraph after 6		**The proposed Spanish Point Karst Area of Critical Environmental Concern (6,500 acres),**
025	1	insert new paragraph after 9		**Powerline construction would not be allowed within one-half mile of bald eagle nests. Powerline construction in sensitive wildlife habitats and across streams would be required to incorporate standard or special design features to reduce bird collisions and reduce impacts to habitat. Additional powerline construction limitations would be applied on a case-by-case basis in special situations to reduce bird collisions.**
025	1	insert new paragraph after 7		**The Medicine Lodge, Renner, and Billy Miles wildlife habitat management units (20,500),**
025	2	1	1	The entire Forest Management section has been modified. See Chapter 2, this document.
025	2	insert after heading		**Resource Management Objective** **To enhance watershed, wildlife, and forest values through the maintenance of a viable and healthy timber base.** **Management Actions**
026	Map 9			Refer to the revised map in this document.
027	1	1-17		These paragraphs have been modified. Refer to the modifications in Chapter 2 of this document.
027	1	3	1	. . . production **in woodlands** for wildlife . . .
027	2	11	1	. . . to prior approval, **including an environmental assessment,** and under the . . .
027	2	3	3	. . . data **are** available . . .
027	2	3	6	. . . vegetative **and wildlife** resources.
027	2	3	1	. . . would continue **as currently authorized** on all . . .
027	2	3	3	. . . Area **unless** adequate . . .
027	2	insert after heading		**Resource Management Objective** **To provide forage for livestock grazing, to reduce livestock grazing conflicts and to improve ecological range condition.** **Management Actions**
028	1	2	4	. . . to prior approval, **including an environmental assessment,** and supervision . . .
028	1	3	4	. . . and the **permittee(s) using** the allotment. . .
028	2	1	1	. . . —Changes in **class, kind and number** of livestock, . . .
028	2	7	3	. . . **species nesting areas** (Map . . .

TABLE 47 (Continued)

TEXT CHANGES

Page	Column	Paragraph	Line	Should Be:
028	2	insert new paragraph after 3		**Livestock grazing would be reduced or eliminated on some allotments or portions of allotments to meet resource management objectives. Sources of springs, reservoirs, other riparian areas, aspen stand regeneration areas and crucial big game winter ranges are examples of areas or sites where livestock use may be eliminated if other grazing management techniques are not adequate to meet the objectives of management.**
029	1	insert after heading		**Resource Management Objective** **To enhance and expand opportunities for recreation while intensively managing areas with high recreation values.** **Management Actions**
029	1	insert new paragraph after 2		**The ORV Play Area limitation on the Pits Motorcycle Area would be removed and special management would be eliminated due to a potential public safety hazard resulting from an increase in H_2S (sour gas) in the area. The area would be redesignated as limited to existing roads and trails.**
029	1	insert new paragraph after 3		**An analysis would be conducted of the existing BLM authorized outfitter/guide activities to evaluate the need for establishing future commercial use limitations and related policies.**
029	Table 8			Refer to the revised table in this document.
031	Map 11			Refer to the revised map in this document.
032	1	10	11	Add: **—Cherry Creek Crossing,** **—Otter Creek,** . . .
032	1	5	1,2	**—Upgrade the access road and develop** three additional. . . Castle Gardens **Scenic Area**,. . .
032	1	6	5	. . . sanitary facilities, **fencing, parking areas, road improvements** and vehicle barriers, **and trail and bridge repair**, depending . . .
032	1	7	3	. . . on Otter Creek, **Paint Rock Creek, Trapper Creek**, and Medicine Lodge . . .
032	1	8	1,2	Delete: . . . **on application** . . .
032	1	insert after heading		**Resource Management Objective** **To protect and enhance important fish and wildlife habitats.** **Management Actions**
032	2	3	2	. . . allowed **planning** area-wide . . .
032	2	5	7	. . . gas operations **on federal leases** would be regulated by **the NPDES and** the Notice . . .
032	2	6	1	**—NTL 2B produced water disposals** would . . .
032	2	7	1	**—NTL 2B produced water disposals** would . . .
032	2	8	1	**—NTL 2B produced water disposals** that would . . .
032	2	heading		Replace with: **Soil and Water Management**
032	2	insert after heading		**Resource Management Objective** **To stabilize soils, increase vegetative production and maintain water quality** **Management Actions**
032	2	insert new paragraphs after 2		**—Public lands covered in the Bighorn River HMP between Thermopolis and Kirby would be managed to facilitate the reintroduction of trumpeter swans.** **—All Bighorn River HMP tracts would be managed to facilitate the reintroduction of ospreys.** **—Public lands on the west slope of the Bighorn Mountains would be managed to facilitate the reintroduction of bighorn sheep.**
033	1	2	1	. . . acres in the **proposed** Spanish Point . . .
033	1	4		Replace with: **Logging and heavy equipment use restrictions would be applied on steep slopes and stream buffer zones.**
033	1	5		This paragraph has been modified. Refer to the modification in Chapter 2 of this document.
033	1	6		Replace with: **Basal vegetative cover would be managed to maximize (or maintain) ground cover in good or better ecological condition, commensurate with the potential of the ecological site.**

TABLE 47 (Continued)

TEXT CHANGES

Page	Column	Paragraph	Line	Should Be:
033	1	7		Replace with: **The federal mineral estate under private surface, national forest system lands, and surface administered by the BLM in the proposed ACEC would be closed to mineral leasing.**
033	1	insert new paragraph after 5		**4. The use of silvicultural chemicals would be prohibited.**
033	2	1	3	. . . for the entire ACEC, **pursuant to Section 204 of FLPMA** . . .
033	2	1		Replace with: **A withdrawal from the nondiscretionary land laws, including mining claim location under the General Mining Law of 1872, would be pursued for the entire proposed ACEC pursuant to Section 204 of FLPMA. The withdrawal would involve the federal mineral estate under private surface, national forest system lands, and surface administered by the BLM.**
033	2	3	4-6	. . . where possible. **To the extent possible,** management prescriptions . . . proposed for **BLM administered** public lands. . .
033	2	4	2,3	. . . allowed **planning** area-wide . . .
034	1	2	2	. . . Appendix I **in the Draft RMP/EIS)** to increase . . .
034	1	3		Replace with: **On sites that fail to respond to grazing management, contour furrowing, surface ripping or seeding projects, or a combination, would be applied to improve vegetative cover and condition, if those sites would have the potential to respond to the treatments.**
034	2	1		Replace with: **Contour furrowing would be applied on about 15,000 acres of saline upland and saline lowland range sites with slopes of less than 6 percent where soil erosion is evident, particularly near gullies and established drainages.**
034	2	2		Replace with: **Seeding would be applied on about 27,000 acres of loamy, shallow loamy, and sandy range sites with inadequate vegetative cover and lack of adjacent seed sources. Seeding could include both pioneer and native species.**
037	1	2	2,3	. . . Wyoming BLM Standard **Oil and Gas Lease Stipulations,** or future . . .
037	1	2	4-7	Delete: **Additional stipulations may be applied at the time of leasing to mitigate impacts not covered by the Wyoming BLM standard stipulations** . . .
037	2	1	1	**—Approximately 129,000 acres (8** percent . . .
037	2	1	3	. . . but with a **"no surface occupancy" restriction** to protect . . .
037	2	2	1	**—Approximately 954,000 acres (60** percent . . .
037	2	2	3,4	. . . leased with **seasonal restrictions** to protect . . .
037	Table 9			Refer to the revised table in this document.
038	Map 14			Refer to the revised map in this document.
039	1	1	1	**—Approximately 520,000 acres (32** percent . . .
039	1	2	5	. . . Wyoming BLM Standard **Oil and Gas Lease** Stipulations (or future . . .
039	1	2	10	. . . BLM standard **stipulations,** including . . .
039	1	2	14,15	. . . surface disturbance **restrictions,** but would . . .
039	1	partial	1	. . . **number 2a or 2b)** to protect . . .
039	2	3	1	. . . **habitat, including Wyoming Game and Fish Department Habitat Management Units,** . . .
039	2	partial	1,2	. . . tar sands, **other than the known Trapper Canyon deposit, are possible but unlikely** in those leased . . .
039	Table 10			Refer to the revised table in this document.
040	2	8	9	. . . to restore **and** maintain . . .
040	2	10	5-7	Delete: . . . **and on the Pits Motorcycle Area (125 acres) to manage recreational and competitive use of the area.**
041	1	6	1,2	. . . allowed **planning** area-wide . . .

TABLE 47 (Continued)

TEXT CHANGES

Page	Column	Paragraph	Line	Should Be:
041	2	2	1,2	. . . allowed **planning** area-wide . . .
042	1	5	2,3	. . . Wyoming BLM Standard **Oil and Gas Lease Stipulations,** or future. . .
042	1	5	5-7	Delete: **Additional stipulations may be applied at the time of leasing to mitigate impacts not covered by the Wyoming BLM standard stipulations** . . .
042	2	1	1	**—Approximately 129,000 acres (8** percent . . .
042	2	1	3-5	. . . **leased, with "no surface occupancy" restriction** to protect . . .
042	2	2	1	**—Approximately 954,000 acres (60** percent . . .
042	2	2	3-5	. . . leased **with seasonal restrictions** to protect . . .
042	2	3	1	. . . acres (**32** percent . . .
042	2	4	4	. . . Wyoming BLM Standard **Oil and Gas Lease Stipulations** (or future . . .
042	2	4	8	. . . species **nesting areas** would be . . .
043	1	1	6,7	. . . tar sands, **other than the known Trapper Canyon deposit, are possible but unlikely** in those leased . . .
043	Table 11			Refer to the **revised** table in this document.
044	Map 15			Refer to the **revised** map in this document.
045	1	1	6-8	**About 750 acres of cultural resource sites and 6,500 acres in the proposed Spanish Point Karst ACEC would be classed as right-of-way avoidance areas.**
045	1	1	5	. . . species **nesting areas** would . . .
045	1	5	7	. . . reduce competition with livestock **and wildlife** in the . . .
046	1	1	3	. . . restoration **and maintenance of** habitat . . .
046	2	3	3	. . . species **nesting areas** (Map . . .
046	2	4	1	Approximately **666,500** acres . . .
046	2	5	1	Approximately **567,200** acres . . .
046	Table 12		1	Line 1 under "Location": **T&E Species Nesting Areas**
046	Table 12		4	Delete the line beginning: **ORV Play Area**
046	Table 12		10	Line 10 under "Estimated Acres": **666,555**
046	Table 12		11	Line 11 under "Estimated Acres": **567,195**
048	1	6	1,2	. . . allowed **planning** area-wide . . .
048	2	1	1,2	. . . allowed **planning** area-wide . . .
049	2	3	2,3	. . . Wyoming BLM Standard **Oil and Gas Lease Stipulations** or future . . .
050	Map 16.1			Refer to the **revised** map in this document.
051	1	1	3,4	. . . **with a "no surface occupancy" restriction** to protect . . .
051	1	2	3-5	. . . leased with **seasonal restrictions** to protect . . .
051	2	2	3,4	. . . **surface** protection **measures** applied.
051	2	2	4-6	. . . Wyoming BLM StandardOil **and Gas Lease Stipulations** (or future . . .
051	Table 13			Refer to the **revised** table in this document.
052	1	partial	4,5	. . . species **nesting areas** and about . . .
052	Table 14			Refer to the **revised** table in this document.

TABLE 47 (Continued)

TEXT CHANGES

Page	Column	Paragraph	Line	Should Be:
053	1	4	1	**—NTL 2B produced water disposals** would . . .
053	1	5	1	**—NTL 2B produced water disposals** would . . .
053	1	6	1	**—NTL 2B produced water disposals that would . . .**
054	1	1	2,3	**. . . allowed planning** area-wide . . .
054	1	11	2,3	. . . Wyoming BLM Standard**Oil and Gas Lease Stipulations** or future . . .
054	1	11	5-8	Delete: **Additional stipulations may be applied at the time of leasing to mitigate impacts not covered by the Wyoming BLM standard stipulations.**
054	1	4	2	. . . would have contour furrowing, **surface ripping** or seeding projects**, or a combination,** applied to improve vegetative cover and condition, **if those sites would satisfactorily respond to the treatments.**
054	1	5		Replace with: **Contour furrowing would be applied on about 15,000 acres of saline upland and saline lowland range sites with slopes of less than 6 percent where soil erosion is evident, particularly near gullies and established drainages.**
054	1	6		Replace with: **Seeding would be applied on about 27,000 acres of loamy, shallow loamy, and sandy range sites with inadequate vegetative cover and lack of adjacent seed sources. Seeding could include both pioneer and native seed types.**
054	2	2	2-4	. . . leased **with a "no surface occupancy" restriction** to protect . . .
054	2	3	3,4	. . . protection **measures** applied.
054	2	3	5,6	. . . Wyoming BLM Standard**Oil and Gas Lease Stipulations** (or future. . .
054	2	5	7,8	. . . tar sands**, other than the known Trapper Canyon deposit, are possible but unlikely** in those leased . . .
055	Map 17			Refer to the revised map in this document.
056	1	3		Replace with: **Seeding would be applied on about 27,000 acres of loamy, shallow loamy, and sandy range sites with inadequate vegetative cover and lack of adjacent seed sources. Seeding could include both pioneer and native seed types.**
056	1	3	5	. . . species **nesting areas** would . . .
056	2	6	2	. . . Fish **Department** Management Units . . .
056	2	insert new paragraph after partial		**—The proposed Spanish Point Karst ACEC,**
056	2	partial	2	An additional **944,500** acres would be . . .
056	Table 15			Refer to the revised table in this document.
057	Table 16			Refer to the revised table in this document.
059	Map 18			Refer to the revised map in this document.
060	1	3	3	. . . species **nesting areas** and . . .
060	2	11	2,3	. . . allowed **planning** area-wide . . .
060	2	insert new paragraphs after 10		**—Public lands covered in the Bighorn River HMP between Thermopolis and Kirby would be managed to facilitate the reintroduction of trumpeter swans.** **—All Bighorn River HMP tracts would be managed to facilitate the reintroduction of ospreys.** **—Public lands on the west slope of the Bighorn Mountains would be managed to facilitate the reintroduction of bighorn sheep.**
062	1	2	7	. . . gas operations **on federal leases** would be regulated by **the NPDES and** the Notice . . .
062	1	3	1	**—NTL 2B produced water disposals** would . . .
062	1	4	1	**—NTL 2B produced water disposals** would . . .
062	1	5	1	**—NTL 2B produced water disposals** that would . . .
062	Table 17			Heading "Acres": **Estimated Acres**

TABLE 47 (Continued)

TEXT CHANGES

Page	Column	Paragraph	Line	Should Be:
062	Table 17		6	Delete the line beginning: **ORV Play Area**
062	Table 17		6	Line 6 under "Acres": **461,655**
063		insert new paragraph after 3		**4. The use of silvicultural chemicals would be prohibited.**
063	1	3		Replace with: **3. The use of insecticides and herbicides would be considered on a case-by-case basis and would be conducted under the following guidelines:** **A. Noxious Weed Control:** **(1) Before chemical control of noxious weeds is approved by the BLM, thorough consideration would be given to all forms of physical and biological control, including, but not limited to hand pulling, the use of hand tools, mowing, prescribed burning, livestock grazing, and the use of insects.** **(2) If chemical application is determined to be the only feasible, acceptable method of control, the proposal shall detail the areas of infestation, the type and method of chemical control, the proposed location of any mixing facilities or storage tanks around the area, and a plan for containment and clean-up of accidental spills of the chemical.** **(3) Aerial spraying would be discouraged.** **(4) The applicator would be required to conduct pre- and post-application water quality sampling to confirm that surface water contamination by the pesticide did not occur.** **B. Grasshopper control:** **(1) The preferred grasshopper infestation control method would be the use of the biological control *Nosema locuste*.** **(2) If the proposed Spanish Point Karst ACEC is within the boundaries of an Animal Plant Health Inspection Service (APHIS) designated economic grasshopper infestation zone, it would be flagged as a "no spray" area.**
063	1	4		Replace with: **5. Basal vegetative cover would be managed to maximize (or maintain) ground cover in good or better ecological condition, commensurate with the potential of the ecological site.**
063	1	5	3	. . . for the entire ACEC, **pursuant to Section 204 of FLPMA.**
063	1	5	1	A withdrawal for **the nondiscretionary land laws, including** mining claim. . .
063	1	replace paragraph 4		**The federal mineral estate under private surface, national forest system lands, and surface administered by the BLM in the ACEC would be closed to mineral leasing.**
063	2	2	2,3	. . . allowed **planning** area-wide . . .
064	1	1	2	. . . would have contour furrowing, **surface ripping** or seeding projects**, or a combination,** applied to improve vegetative cover and condition**, if those sites would have the potential to respond to the treatments.**
064	1	2		Replace with: **Contour furrowing would be applied on about 15,000 acres of saline upland and saline lowland range sites with slopes of less than 6 percent where soil movement was in evidence, particularly near gullies and established drainages.**
067	2	insert new sentence at beginning of 3		**Coal lands, which are those areas underlain by geologic formations known to contain coal, total about 300,000 acres (Map 20).**
067	2	insert new sentences at beginning of 4		**The Trapper Canyon deposit is the only known, demonstrably economic tar sand deposit in the resource area. It is a stratigraphic trap in the upper Tensleep Formation, in an elevated position, yet protected from erosion by the overlying Phosphoria Formation. Other such deposits are possible but have probably eroded away. There is excellent potential for the same traps farther west in the subsurface where the hydrocarbon would be heavy oil instead of tar (Ver Ploeg and De Bruin, 1985).**
068	Map 20			Refer to the revised map in this document.
069	1	3	2	. . . **minerals in the study area.**
069	1	4	7,8	. . . sand and gravel pits **and other mineral material disposal sites** in the . . .
069	1	partial	1-3	. . . issued prior to **the Combined Hydrocarbon Leasing Act of** November 16, 1981. Only four leases (amounting to about . . .

TABLE 47 (Continued)

TEXT CHANGES

Page	Column	Paragraph	Line	Should Be:
069	1	replace paragraph 1		**Bentonite occurs in a broad, curving band or zone of outcrops from Shell Creek to Kirby (Map 21). The zone is nearly 100 miles long and 10 miles wide. Bentonite beds occur in the zone at some 30 separate stratigraphic horizons, in the Thermopolis shale, Mowry Shale, Frontier Formation and Cody Shale. The maximum aggregate bed thickness is nearly 100 feet and the total maximum bentonite resource is about 85 million tons. A conservative estimate of proven reserves is 50 million tons.**
069	1	replace paragraph 2		**Gypsum beds are sporadically exposed in outcrops of the Gypsum Spring, Chugwater, and Phosphoria (Goose Egg) formations. These beds outcrop in a band about 8 miles wide and 64 miles long. Mapped areas of the formations are combined and generalized on Map 21. The estimated recoverable gypsum is about 5 million tons.**
070	2	3	9	. . . areas. **The coniferous forest shown on Map 25 is the productive forest land in the resource area. The timber base may be all or part of the productive forest, depending on decisions made by BLM managers. The current timber base is shown on timber type maps maintained at the Worland District Office.**
070	Map 21			Refer to the revised map in this document.
071	2	insert new paragraph after 2		**Some soils developed from shales and stratified sedimentary rocks have shrink-swell clays and susceptibility to piping, seepage, and slumping. These features could pose safety or other problems to land uses such as oil and gas exploration. They are scattered throughout the planning area, but are most commonly found in general soils units B2, B3, and B4.**
075	Table 19			Refer to the revised table in this document.
077	2	1	3,4	. . . (70 percent), **woodlands, including juniper, aspen, mountain mahogany, and ponderosa pine woodlands** (3 percent) . . .
077	2	2	10,11	Delete: **. . . under normal conditions.**
077	2	insert new paragraph after 4		**Generally, areas that have received heavy, repeated sheep use in the past have had browse species reduced, allowing grasses to increase. Opposite results have occurred where cattle have traditionally grazed, causing an increase in some sagebrush species. These vegetative changes are accelerated on areas where livestock have been grazed without regard to soil and plant needs. In this situation, cattle and sheep tend to create monocultures, depending upon the habitat type on which the use occurs, by eliminating important plant species.**
079	1	3	8	. . . accessible **areas is characterized by evidence of** heavy . . .
079	Table 21			Replace **Percent Forest Base** with **Percent Timber Production Base**
082	1	4	5	The elk winter on **public lands administered by the** BLM . . .
082	1	insert new paragraph before 4		**The location and maintenance of range projects, and forage, cover and spatial competition, are the primary year-round conflicts between livestock and all big game in the resource area.**
082	2	insert new paragraph after 1		**White-tailed deer live in riparian habitats along the Bighorn and Nowood rivers. The management of white-tailed deer populations is the same as for mule deer in the stream and river bottoms throughout the resource area.**
086	Map 30			Refer to the revised map in this document.
087	1	1	1	Delete **bobcat**.
087	1	2	1	Furbearers include **bobcat**, beaver, . . .
089	2	4	2	. . . **walleye** . . .
090	Table 21.1			Insert Table 21.1 between pages 90 and 91.
090	1	1	4	. . . Bighorn Mountains. **The scenic resources are also divided into management classes for purposes of visual resource management. The VRM classes are shown on Map 31.1 and are defined in the glossary. Table 21.1 shows the acreage in each management class.**
090	Map 31.1			Insert map 31.1 between pages 90 and 91.

TABLE 47 (Continued)

TEXT CHANGES

Page	Column	Paragraph	Line	Should Be:
092	2	1	6	. . . motorcycles. **A public safety problem was identified early in 1987 at the Pits Motorcycle Use Area. An increase in the use of water injection in oil and gas wells in the vicinity of the Pits has resulted in a significant increase in H_2S (sour gas) in the area. The increased presence of the gas presents a potential safety problem for users of the Pits.** A limited . . .
092	2	insert new paragraph after partial		**The entrance to P Bar Cave is located on the Bighorn National Forest, but the cave's passages are located under public lands. An estimated 3 to 4 miles of passages have been explored, of which two miles have been mapped. Two levels of passages are present; an upper level of ephemeral floodways, and a lower level that captures the entire base flow of Medicine Lodge Creek. Visitor use levels are unknown.**
093	Map 33			Refer to the revised map in this document.
094	1	1	5,6	. . . date, **more than 600 sites** have been formally recorded**, and about 98 percent of the sites are on public lands.** Of these . . .
094	1	2	5,6	. . . approximately **130 of the sites** recorded . . .
096	2	1	9-14	. . . 91 were actually drilled. **Of these wells, only 12 were producers, and all were drilled in high potential areas. The remaining 79 wells drilled were all dry and abandoned. Sixty-four of these wells were drilled in areas of high potential, 12 were drilled in areas having moderate potential [now considered low potential], and 3 were in low potential areas.**
096	2	3	1	. . . **at 46 million** . . .
096	2	replace paragraph 2		**The Trapper Canyon tar sand deposit is not currently in production. Exploratory drilling occurred there in 1980 and again in 1984.**
097	1	1	1	Five companies **mine bentonite in the resource area. The pits are located** in the . . .
097	1	1	4-6	Replace with: **Thorson (1983) reports the amount of bentonite produced in the Big Horn Basin was 42 percent of the Wyoming total for the 5 years previous to 1983 and 30 percent for the 20 years before that, indicating the growing importance of production in the Big Horn Basin.**
097	1	1	7,8	**Mill production in the Washakie Resource Area** was about . . .
097	1	partial	1	. . . lack of production **and prospective market** in the past **suggest** little . . .
097	1	partial	2	. . . **is likely in the near future.**
103	1	5	4-7	. . . about **5 percent** would be leased with a **"no surface occupancy" stipulation** and another **61 percent** would be leased with **seasonal restrictions.**
103	2	1	2	. . . to mineral leasing**, mineral location** and geophysical . . .
103	2	9	3	. . . vegetative **and wildlife** resources.
103	2	partial	2	. . . various kinds **and surface protection measures**, and would . . .
104	2	1	1	. . . development **land** and. . .
104	3	1	2,3	. . . more **prescribed burning,** timber slash. . .
105	3	1	15	Begin a new paragraph after **MBF/yr.**
105	3	1	22	Begin a new paragraph after **unclassified.**
107	3	3	4	. . . range **developments** would. . .
107	6	3	2	. . . Alternative A**, but at about half the rate.**
110	1	11	11	. . . years **(April 1976 to March 1986)**, 91 wildcat . . .
110	1	insert new paragraph after 4		**—The West Slope and Bighorn River HMPs would be fully implemented, including an expansion of the West Slope HMP.**
110	2	1	3-5	Delete sentence.
111	Table 26			Refer to the revised table in this document.

TABLE 47 (Continued)

TEXT CHANGES

Page	Column	Paragraph	Line	Should Be:
114	2	2	3	. . . but at **5 times the rate of Alternative B and one-half the rate of Alternative D.** In general . . .
116	1	3	1	. . . would be improved as **existing HMPs and** new AMPs . . .
116	2	insert new paragraph after 3		**Opportunities for motorized vehicle recreation, hunting, snowmobiling, etc., would be moderately impacted during the winter and spring along the west slope of the Bighorn Mountains, because of seasonal off-road vehicle closures designed to protect soils, watersheds, and wildlife habitat. Seasonal closures of vehicle routes on the west slope would reduce total recreation visitor use days by less than 5 percent. However, nonmotorized access (e.g., hiking and horseback riding) still would be available. Vehicle use and access would not be affected during the summer months.**
116	2	partial	4	. . . by **creating cover, improving food production and spawning areas, and** reducing . . .
116	2	partial	4	Add: **From a fisheries standpoint, the Preferred Alternative is better on a comparative basis, than Alternatives A, B and C, but is not as good as Alternative D.**
117	Table 30			Under the heading "ROS Classes", change "User Days" to **Acres**.
119	2	insert new sentence at the end of 2		**This loss rate would cause a long-term decline in soil fertility and vegetative production in the parts of the planning area most heavily impacted by excessive grazing and other disturbances.**
120	1	2	11	. . . Alternative A. **There would be a steady improvement in the condition of fish habitat.** Sage grouse . . .
121	1	3	4-6	. . . leased with **a "no surface occupancy" restriction** and . . .
121	1	3	7,8	. . . leased with **seasonal restrictions.**
121	2	4	3	Delete: . . . **and the Pits Motorcycle Area**.
121	2	9	2	. . . **wetland/riparian** . . .
122	Table 31	title		ESTIMATED **ANNUAL** SOIL LOSS . . .
127	2	2	2	. . . tons annually, **in addition to the 1.46 million tons of natural soil loss. This loss rate would cause a long-term decline in soil fertility and vegetative production in the parts of the planning area most heavily impacted by excessive grazing and other disturbances.**
128	1	4	10	Add: **Fish habitat would stabilize or slowly improve.**
129	1	2	5,6	. . . leased with **a "no surface occupancy" restriction** and . . .
129	1	2	7,8	. . . leased with **seasonal restrictions.**
130	Table 35	title	2	**(PERCENT CHANGE)**
130	Table 35	title		ESTIMATED **ANNUAL** CHANGE IN . . .
132	1	2	12	Delete: **sufficiently**
134	Table 39			Under the heading "ROS Classes", change "User Days" to **Acres**.
137	2	4	2	. . . tons/year, **in addition to the 1.46 million tons of natural soil loss. This loss rate would cause a long-term decline in soil fertility and vegetative production in the parts of the planning area most heavily impacted by excessive grazing and other disturbances.**
138	1	6	6	Add: **Fish habitat would improve as stream zones are restored and new reservoirs are constructed.**
139	1	2	2-4	. . . leased with **a "no surface occupancy" restriction.**
139	1	2	4-6	. . . leased with **seasonal restrictions,** and. . .
139	1	2	7,8	. . . surface protection **measures.**
139	2	3	5	. . . seasonal **restrictions** as in. . .
139	2	4	2	. . . soil **compaction,** riparian . . .
139	2	4	6	. . . productivity, sedimentation . . .

TABLE 47 (Continued)

TEXT CHANGES

Page	Column	Paragraph	Line	Should Be:
140	1	4	4,5	. . . with **a "no surface occupancy" restriction.** The . . .
141	Table 40	title	2	**(PERCENT CHANGE)**
141	Table 40	title		ESTIMATED **ANNUAL** CHANGE IN . . .
144	1	1	4	. . . habitat would occur **at a rate twice that of the Preferred Alternative and Alternative A,** as a result . . .
146	1	2	4	. . . habitat would **rapidly** improve . . .
146	1	2	4	. . . protective fences **and other management techniques.**
147	Table 44			Under the heading "ROS Classes", change "User Days" to **Acres**.
150	2	2	2	. . . tons/year, **in addition to the 1.46 million tons of natural soil loss. This would result in relatively isolated areas of long-term decline in soil fertility and vegetative production.**
151	1	2	4	. . . would **rapidly** improve.
151	2	1	2	. . . would **rapidly** improve . . .
155	1	2	4	. . . **land was a priority**.
155	2	3	7	. . . contributors to **soil and water** problems. . .
155	2	4	12	. . . individuals felt **public land** should. . .
156	1	2	4	. . . solicited **and used. The members of the Advisory Council toured a portion of the Washakie Resource Area during a meeting on August 20, 1986. The tour was designed to provide examples of concerns identified in the plan. In two subsequent meetings, on December 12, 1986, and March 10, 1987, the council discussed the Washakie RMP/EIS and the Washakie Wilderness EIS.**
158	2	insert new paragraphs after list		Refer to added paragraphs in this document.
159	Appendix A			This appendix has been modified. Refer to Appendix A in this document.
162	Appendix B			This appendix has been modified. Refer to Appendix B in this document.
171	Appendix D			This appendix has been modified. Refer to Appendix D in this document.
183	Table E-1			Refer to the revised table in this document.
185	Appendix F			This appendix has been modified. Refer to Appendix F in this document.
188	1	3	3	. . . to the west, **and** Cambrian and . . .
191	Table G-2			The figures in the columns "Million Gallons" and "Acre-Feet" are all annual figures.
193	1	1	6	. . . transmissivity of 4.4 x **10^3** gallons . . .
193	1	2	2	. . . personnel **on** Trapper . . .
194	1	2	12,13	. . . karst systems and **[interpretation of data collected from dye studies],** is . . .
198	1	3	3,4	Lack of **interest, past production or** market outlook . . .
198	1	4	1	. . . companies **have** mining . . .
198	1	5	2,3	. . . area. **Because the gypsum is relatively remote, the chances of development are low. Mining activity is limited to claim work and rock hounding. This level of** . . .
198	2	insert new sentence at the beginning of 6		**Soil erosion in excess of an average of 1.5 tons per acre per year would result in the loss of the planning area's topsoil base.**
204	1	5	6	. . . in reservoirs **should improve** as old . . .
204	1	5	7	. . . silt in and new, **deeper** ones . . .

TABLE 47 (Continued)

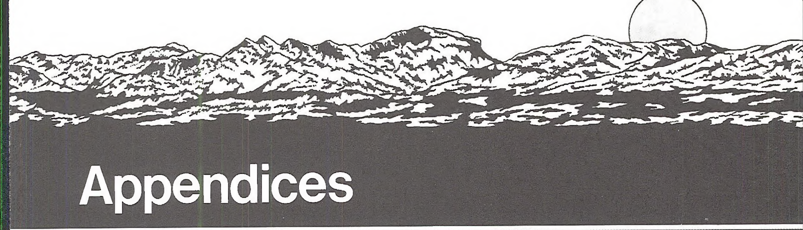
TEXT CHANGES

Page	Column	Paragraph	Line	Should Be:
205	1	4	7	. . . surface (e.g., **wilderness designation, spray projects, and dispersed recreation activities like hiking and camping)**, or for . . .
207	2	6	6-10	Replace with: **For example, oil and gas exploration or unrestricted livestock grazing could cause long-term water quality and fish habitat problems, if the stream channel is degraded and a sustained sediment load and loss of habitat result.**
211	insert appendixes			After Appendix K, insert Appendixes L, M, N, and O.
214	1	7	4	. . . structures, **buildings**, objects . . .
214	1	Insert new paragraph after 10		**DESIRABLE SPECIES (PLANT). Those species of plants in a natural community or in an area exhibiting excellent ecological range condition.**
214	2	1	11	. . . unclassified-rock . . .
214	2	1	11	. . . vegetation, unclassified-rock outcrop . . .
214	2	1	12	. . . unmapped. **Ecological condition should not be confused with any rating given for a specific use or value (see Resource Value Rating).**
215	1	Insert new paragraph after 15		**KEY SPECIES. (1) A forage species whose use serves as an indicator to the degree of use of associated species. (2) Those species which must, because of their importance, be considered in the management program. (RISC report)**
215	2	Insert new paragraph after 11		**NO SURFACE OCCUPANCY: Lands or leases designated such will not be permitted to have surface disturbance or be occupied by facilities. Such a designation may for example allow for subsurface mineral extraction where access can occur from adjacent areas not designated.**
215	2	Insert new paragraph after 11		**NO LEASE: Areas designated such will not be leased. This designation is applied primarily to oil and gas leasing (simultaneous, competitive and over-the-counter;however, such limitation could also apply to coal and other leasable minerals.**
215	2	12	3	. . . natural terrain. **ORV designations apply to the use of all types of ORVs on and/or off roads and trails.**
215	2	8	4	. . . natural **environment**, and . . .
216	1	11	2	. . . various **federal and** state agencies . . .
216	1	12	4	. . . Washakie **counties**. A detailed . . .
216	1	13	5	. . . in the **area. Riparian** vegetation . . .
216	1	13	5,6	. . . occur in the **area. Riparian** vegetation . . .
216	1	14	5	. . . natural **environment**. Challenge . . .
216	1	5	3	. . . natural **environment**, to . . .
216	1	Insert new paragraph after 7		**RANGE MANAGEMENT. The science and art of optimizing the returns from rangelands in those combinations most desired by and suitable to society through the manipulation of range ecosystems. (Stoddart, Smith and Box)**
216	1	Insert new paragraph after 12		**RESOURCE VALUE RATING. The value of vegetation present on an ecological site for a particular use or benefit.**
216	1	Insert new paragraph after 5		**PRODUCTIVE FOREST LAND. Land capable of producing at least 20 cubic feet of wood fiber per acre per year.**
216	1	Insert new paragraph after 13		**RIPARIAN VEGETATION. (See RIPARIAN HABITAT)**
216	2	8	5	. . . natural **environment**, to . . .
219	1	2	3,4	**Prepared under Contract YA-553-CT2-1067 for** . . .

TABLE 47 (Continued)

TEXT CHANGES

Page	Column	Paragraph	Line	Should Be:
219	2	Insert new paragraph after 6		**Gese, D. D.** **1987 Mineral Investigation of the Trapper Creek (WY-010-242), Alkali Creek (WY-090-241), and Medicine Lodge (WY-010-240) Wilderness Study Areas, Big Horn County, Wyoming: U. S. Bureau of Mines Mineral Land Assessment Open File Report MLA 2-87, 12 pp.**
220	1	2	3	. . . **Volume 25, No. 4, pp.443-448.**
220	2	Insert new paragraph after 12		**Spencer, C. W.** **1983 Petroleum Potential of Wilderness Lands, Wyoming: in Miller B. M., ed. Petroleum Potential ofWilderness Lands in the Western U. S.: U. S. Geological Survey Circular 902-A-P, pp. M1-M10.**
220	2	Insert new paragraph after 13		**Stone, D. S.** **1967 Theory of Paleozoic Oil and Gas Accumulation in the Big Horn Basin, Wyoming: American Association of Petroleum Geologists Bulletin Vol. 51, No. 10, pp. 2056-2114.**
220	2	8	3	. . . Utah. **183 pp.** . . .
221	1	Insert new paragraph after 2		**Thorson, T.A.** **1983 Commercial development of Big Horn Basin Bentonite Reserves, in Wyoming Geological Association Guidebook, 34th Annual Field Conference - 1985: pp. 167-170.**
221	2	Insert new paragraph after 13		**Ver Ploeg, A. J., and De Bruin, R. H.** **1985 Trapper Canyon Tar Sand Deposit, Big Horn County, Wyoming, An Exhumed Stratigraphic Trap: Geological Survey of Wyoming Report of Investigations No. 30, 30 pp.**
222	2	7		Replace with: **Wyoming Geological Survey** **1976 "Caves of Wyoming" by Hill, C., Sutherland, W., and Tierney, L., University of Wyoming, Laramie, WY.**
222	2	Insert new paragraph after 7		**Yorgason, et al.** **1983 "Annual Upland Game and Small Game District II 1983 Completion Report." Wyoming Game and Fish Department, Cody WY.**



Appendices

APPENDIX A

WYOMING BLM STANDARD OIL AND GAS LEASE STIPULATIONS (ALSO STANDARD MITIGATION GUIDELINES FOR SURFACE DISTURBING ACTIVITIES)

The following standard stipulations will be applied to oil and gas leases to provide surface protection. However, the use of these stipulations transcends just oil and gas. They are also used as mitigation guidelines for all other activities, and provide a basis for developing mitigation requirements and stipulations for all types of surface disturbing and other human presence impacts.

The objectives in using these stipulations and guidelines are to reserve, for the Bureau, the right to modify the operations of surface disturbing activities as part of our statutory requirements for environmental protection and to inform a potential lessee, permittee, or operator of the environmental conditions present in a given area.

In the specific case of oil and gas activities (leasing, exploration, development, and production), the appropriate standard stipulations are applied to oil and gas leases at the time of issue. When subsequent oil and gas related activities are proposed (such as submitting an Application for Permit to Drill - APD), the stipulations may be complemented by the application of additional mitigations, or may otherwise be modified, as a result of the environmental analysis process. A detailed plan addressing mitigation and special restrictions on development will be required prior to the development of a lease and will become a condition for approval in the APD.

Those resource activities or programs currently without a standardized set of permit or operation stipulations can use the mitigation guidelines as conditions of approval or as a baseline for developing specific stipulations for that activity or program. Within similar geographical or ecological settings, land use activities should be subject to similar kinds of environmental protection standards. Therefore, it appears that application of these guidelines to all disturbance types of land use actions proposed for BLM-administered public lands will assure more uniform mitigation of impacts than has occurred in the past. Further, justification for deviating from the standards in certain cases will be more obvious and understandable by having the impacts of the standards as a ready basis for comparison.

APPENDIX A

1. SURFACE DISTURBANCE STIPULATION (Used On All Leases)

Surface disturbance will be prohibited in any of the following areas or conditions. Modifications to this limitation may be approved in writing by the Authorized Officer.

a. Slopes in excess of 25 percent.

b. Within important scenic areas (Class I and II Visual Resource Management areas).

c. Within 500 feet of surface water and/or riparian areas.

d. Within a quarter mile or visual horizon (whichever is closer) of significant sites along historic trails.

e. Construction with frozen material or during periods when the soil material is saturated, or when watershed damage is likely to occur.

Guidance

The SURFACE DISTURBANCE STIPULATION will be included on all lease parcels. The intent of this stipulation is to inform interested parties (potential lessees) that, when one or more of the five (a through e) environmental conditions exist, surface disturbing activities will be prohibited unless or until the lessee or his designated operator and the surface management agency (SMA) arrive at an acceptable plan for mitigation of anticipated impacts. This negotiation will occur prior to development of the lease and become a condition for approval in the Application for Permit to Drill (APD).

Specific threshold criteria (e.g., 500 feet from water and/or riparian areas) have been established based upon the best information available. However, geographical areas and time periods of concern must be delineated at the field level (i.e., "surface water and/or riparian areas" may include both intermittent and ephemeral water sources or may be limited to perennial surface water). These decisions, where possible, should be documented in the land use planning documents.

This stipulation will be applied to all oil and gas lease parcels.

2. WILDLIFE STIPULATION

a. To protect important big game winter habitat, drilling and other surface disturbing activity will not be allowed during the period November 15 to April 30 within certain areas encompassed by this lease. The same criteria applies to defined elk calving areas from the period of May 1 to June 30. This limitation does not apply to maintenance and operation of producing wells. Modifications to this limitation in any year may be approved in writing by the Authorized Officer.

b. To protect important raptor and/or sage and sharp-tailed grouse nesting habitat, drilling and other surface disturbing activity will not be allowed during the period from February 1 to July 31 within certain areas encompassed by this lease. This limitation does not apply to maintenance and operation of producing wells. Modifications to this limitation in any year may be approved in writing by the Authorized Officer.

c. No surface occupancy will be allowed on that portion of the lease within area (legal description) for the purpose of protecting (e.g., sage/sharp-tailed grouse strutting) habitat. Modification to this limitation in any year may be approved in writing by the Authorized Officer.

Guidance

The WILDLIFE STIPULATION is intended to provide two basic types of protection, seasonal restriction (a and b) and no surface occupancy (c). Legal descriptions will ultimately be required and should be measurable and legally definable. There are no minimum subdivision requirements at this time. The area delineated can and should be refined as necessary based upon current biological data at the time the APD is processed. It should eventually become a condition for approval in the Application for Permit to Drill.

The seasonal restriction section of the mitigation identifies three groups of species and delineates three similar timeframe restrictions. These two restrictions affect big game ungulates, raptors and grouse. The big game ungulates including elk, moose, deer, antelope, and bighorn sheep all require protection of crucial winter range between November 15 and April 30. Raptors including eagles, accipiters, falcons, buteos, osprey, ferruginous hawks, burrowing owls, and sage and sharp-tailed grouse all require nesting protection during periods between February 1 and July 31. The same birds often require protection from disturbance during the period of November 15 through April 30 while they occupy wintering concentration areas.

The no surface occupancy section of the stipulation is intended for protection of unique wildlife and wildlife habitat values (e.g., sage grouse strutting grounds, known threatened and endangered species habitat, etc.) which cannot be protected using seasonal restrictions.

3. SPECIAL RESOURCE PROTECTION STIPULATION

In order to protect (resource value), the District Manager reserves the right to prohibit activities or surface disturbance (i.e., within a specific distance of the resource value or between date-to-date) in (legal subdivision). This limitation does not apply to operation and maintenance of producing wells. Modifications to this limitation may be approved in writing by the Authorized Officer.

Resource Category:

a. Recreation areas.

b. Special history or paleontological features.

c. Special management areas.

d. Sections of major rivers.

e. Prior existing rights-of-way.

f. Occupied dwellings.

Guidance

This SPECIAL RESOURCE PROTECTION STIPULATION is intended for use only in the very specialized, site-specific situations where one of the other three general stipulations will not adequately address the concern. The resource value, location, and specific restriction must be clearly identified. A detailed plan addressing mitigation and special restrictions on development will be required prior to development of a lease and become a condition for approval in the Application for Permit to Drill or Sundry Notice.

4. NO SURFACE OCCUPANCY STIPULATION

No surface occupancy will be allowed on the following described lands (legal subdivision/area) because of (resource value). See examples.

a. Recreation and interpretive areas (campground, historic trails, national monuments).

b. Major reservoirs/dams.

c. Special management areas (e.g., Area of Critical Environmental Concern, wild and scenic rivers).

Guidance

The NO SURFACE OCCUPANCY STIPULATION (NSO) is intended for use only when other stipulations are determined insufficient to adequately protect the public interest and/or as an alternative to "no leasing." The legal subdivision and resource value of concern must be identified in the stipulation and tied to a land use planning document. There will be no exceptions to this stipulation granted without modification of the appropriate land use plan.

When considering the no lease option, a rigorous test must be met and fully documented in the record. This test must be based on the stringent standards of the Interior Board of Land Appeals. Since rejection of a lease offer is more severe than the most restrictive stipulation, the record must show that consideration was given to leasing subject to reasonable stipulations, including NSO stipulation. The record must also show that stipulations were determined to be insufficient to adequately protect the public interest. A no-lease decision should not be made solely because it appears that directional drilling would be unfeasible, especially where a NSO lease may be acceptable to a potential lessee. In such cases the opportunity to accept or refuse a NSO lease should be left to the potential lessee.

Exception(s) by the District Manager to the NSO stipulation will be subject to the same test used to initially justify the imposition of this stipulation. If the NSO stipulation is justified but upon development less restrictive stipulations would adequately protect the public interest, then an exception to the NSO stipulation could be granted. The record must show that because conditions and uses have changed, less restrictive stipulations will protect the public interest.

APPENDIX B

LAND DISPOSAL CRITERIA AND TRACTS THAT MAY BE SUITABLE FOR CONSIDERATION FOR DISPOSAL, EXCHANGE OR ACQUISITION

Land Disposal Criteria

Listed below are the criteria that will be applied on a case-by-case basis to tracts of land that may have future potential for transfer.

Criteria established by policy, law, or regulation, which make lands unsuitable for sale or exchange:

1. Lands with mining claims of record under Section 314 of FLPMA
2. Lands withdrawn or segregated pending withdrawal, depending on the order
3. Wetlands requirements (parcels containing wetlands can be disposed, if:)

   (a) The tract is so small or remote that it is uneconomical to manage, and

   (b) The tract is not suitable for management by another federal agency, and

   (c) The patent contains restriction of uses prohibited by wetland regulations, and

   (d) The patent contains restrictions and conditions that ensure protection of wetlands on a continuous basis.
4. Lands in WSAs
5. Lands in crucial and critical habitat including T&E habitat, and
6. Lands closed by Secretarial Order.

Criteria established by policy, law, or regulation which make lands unsuitable for desert land entry.

1. Lands mineral in character under 30 U.S.C. 21
2. Wetlands (see A, above)
3. WSAs
4. Lands in crucial and critical habitat including T&E habitat
5. Lands closed by Secretarial Order
6. Lands where the water source has been fully appropriated
7. Lands where less than one-eighth of any particular parcel can be irrigated
8. Timbered lands, and
9. Lands that have been effectually reclaimed.

Listed below are additional items which are to be considered during the process of review or evaluation of proposals for land disposal. These items may be applied to further the management objectives of various programs and may make lands undesirable for sale, exchange or entry.

1. Lands adjacent to existing withdrawals which should be withdrawn to complete management goals
2. Lands in semi-primitive nonmotorized ROS classes
3. Lands in VRM classes I and II
4. Lands in approved management plans (HMPs, SRMAs, RAMPs, caves, etc.), unless disposal would enhance management
5. Lands included in Wyoming Game and Fish Habitat Management Units
6. Lands with cultural resource sites suitable for national register designation
7. Lands with severe soil use limitations
8. Karst areas, and
9. Land without legal access.

Note: Disposal by exchange may cause the foregoing criteria and items for consideration to be modified if the unique qualities of the lands acquired offset the qualities of the lands transferred.

Tables B-1 and B-2 summarize tracts that may be suitable for consideration for disposal and acquisition, respectively. Tables B-3 and B-4 describe in detail the tracts that may be suitable for consideration for disposal and acquisition, respectively.

APPENDIX B

TABLE B-1

SUMMARY OF TRACTS THAT MAY BE SUITABLE FOR CONSIDERATION FOR DISPOSAL

Land Description		
Township (North)	Range (West)	Acres
41	87	820.44
41	88	334.40
41	89	317.86
41	90	520.00
41	91	560.00
41	92	720.00
41	93	881.24
42	86	554.31
42	87	840.00
42	90	80.00
42	91	40.00
42	93	1,160.00
43	86	1,159.71
43	87	2,200.74
43	90	23.91
44	86	1,440.00
44	87	1,165.46
44	94	44.70
45	86	479.53
45	87	441.77
45	88	40.38
46	86	531.75
46	87	660.00
46	88	315.19
47	89	94.15
47	86	1,399.88
47	87	380.00
47	88	197.37
48	88	20.68
48	89	480.00
48	90	637.32
49	90	532.33
50	90	80.00
51	88	261.03
51	89	1,393.72
52	88	420.12
52	89	280.00
52	92	411.50
53	91	160.00
TOTAL		**22,079.49**

TABLE B-2

SUMMARY OF TRACTS THAT MAY BE SUITABLE FOR CONSIDERATION FOR ACQUISITION

Land Description		
Township (North)	Range (West)	Acres
41	86	1,300.36
41	88	947.87
41	89	158.95
42	86	1,000.00
42	87	1,120.00
42	88	160.63
42	89	3,640.00
42	90	640.00
42	92	4,078.16
42	93	720.00
43	86	80.00
43	87	1,640.00
43	92	960.00
43	94	638.83
44	86	1,441.53
44	87	1,880.00
44	94	582.21
45	86	640.00
45	87	3,280.00
45	88	800.00
45	89	640.00
45	93	640.00
45	95	640.00
46	86	1,200.00
46	87	720.00
46	88	680.00
46	90	1,600.00
47	87	640.00
48	87	680.00
48	88	1,240.00
48	89	1,640.00
49	87	160.00
49	88	2,675.82
49	89	2,054.53
50	88	1,480.00
50	89	1,801.06
50	90	640.00
50	92	640.00
50	93	480.00
51	89	2,760.00
51	90	1,405.02
51	91	751.43
51	93	500.00
52	88	80.00
52	89	640.00
52	90	4,467.31
52	91	1,564.88
53	89	240.00
53	90	400.00
TOTAL		**58,777.59**

APPENDIX B

TABLE B-3

DESCRIPTION OF TRACTS THAT MAY BE SUITABLE FOR CONSIDERATION FOR DISPOSAL

Land Description
Township/Range

T. 41 N., R. 87 W.
Sec. 1: Lot 11
Sec. 7: E1/2SE1/4
Lot 4
Sec. 10: Lot 4
Sec. 11: Lot 5
Lot 6
Lot 9
NE1/4NW1/4
Sec. 14: Lot 5
Lot 6
Lot 7
N1/2SE1/4
NE1/4SW1/4
Sec. 16: Lot 3
Lot 4
Sec. 17: Lot 1
Lot 2
Lot 3
NE1/4NE1/4
W1/2E1/2
Sec. 19: SE1/4NE1/4
Sec. 20: SW1/4NW1/4
N1/2SW1/4
NW1/4SE1/4
Sec. 22: Lot 4
SE1/4NE1/4
Sec. 23: Lot 9
Lot 10

T. 41 N., R. 88 W.
Sec. 13: NW1/4SE1/4
Sec. 15: NE1/4NE1/4
Sec. 22: Lot 5
SE1/4SW1/4
Sec. 24: W1/2NE1/4
SE1/4NW1/4
N1/2SW1/4

T. 41 N., R. 89 W.
Sec. 18: Lot 3
Sec. 8: Lot 4
E1/2NE1/4
E1/2SW1/4
N1/2SE1/4

T. 41 N., R. 90 W.
Sec. 13: E1/2SE1/4
Sec. 20: SE1/4NE1/4
Sec. 21: NW1/4NW1/4
Sec. 23: W1/2SW1/4
Sec. 24: N1/2NE1/4
SE1/4NE1/4
SE1/4NW1/4
NE1/4SW1/4
Sec. 26: NE1/4NW1/4
Sec. 27: NW1/4NE1/4

T. 41 N., R. 91 W.
Sec. 9: E1/2SW1/4
SE1/4

Land Description
Township/Range

T. 41 N., R. 91 W. (Cont.)
Sec. 11: SE1/4SW1/4
Sec. 17: E1/2NE1/4
NE1/4SE1/4
Sec. 18: NE1/4SE1/4
Sec. 24: SW1/4NW1/4
Sec. 29: NE1/4SW1/4
Sec. 35: SW1/4NW1/4

T. 41 N., R. 92 W.
Sec. 9: SW1/4SW1/4
Sec. 11: SE1/4NW1/4
Sec. 15: SE1/4SW1/4
Sec. 21: SW1/4NE1/4
NW1/4SE1/4
Sec. 22: W1/2NE1/4
E1/2NW1/4
SE1/4NW1/4
SE1/4SE1/4
Sec. 27: NE1/4NE1/4
SW1/4NE1/4
S1/2NW1/4
Sec. 28: S1/2NW1/4
SE1/4N21/4

T. 41 N., R. 93 W.
Sec. 3: Lot 1
Lot 4
SW1/4nw1/4
Sec. 4: SE1/4NE1/4
Sec. 14: W1/2NW1/4
N1/2SW1/4
Sec. 15: E1/2NE1/4
Sec. 22: S1/2NW1/4
NE1/4SW1/4
W1/2SE1/4
Sec. 23: E1/2W1/2
Sec. 34: SE1/4SE1/4
Sec. 35: S1/2SW1/4

T. 42 N., R. 86 W.
Sec. 20: SW1/4NW1/4
Sec. 30: Lot 1
Lot 2
Lot 3
Lot 4
N1/2NE1/4
SE1/4NW1/4
Sec. 31: Lot 1
N1/2NE1/4
NE1/4NW1/4
Sec. 32: S1/2SW1/4

T. 42 N., R. 87 W.
Sec. 10: SW1/4NE1/4
W1/2SE1/4
Sec. 15: NW1/4NE1/4
Sec. 25: E1/2SE1/4
Sec. 34: NW1/4NE1/4
SW1/4NW1/4
N1/2S1/2

Land Description
Township/Range

T. 42 N., R. 90 W.
Sec. 30: E1/2NE1/4

T. 42 N., R. 91 W.
Sec. 1: NW1/4SE1/4

T. 42 N., R. 93 W.
Sec. 15: NW1/4SW1/4
Sec. 20: SW1/4SE1/4
Sec. 21: NE1/4NW1/4
Sec. 22: SE1/4SE1/4
Sec. 27: N1/2SE1/4
Sec. 28: S1/2NE1/4
E1/2SE1/4
Sec. 29: SW1/4NE1/4
Sec. 29: NE1/4SW1/4
NW1/4SE1/4
Sec. 32: W1/2SW1/4
Sec. 32: NW1/4SW1/4
SE1/4
Sec. 33: NW1/4NW1/4
S1/2NW1/4
SW1/4
NW1/4SE1/4
Sec. 34: NE1/4NW1/4

T. 43 N., R. 86 W.
Sec. 2: Lot 4
S1/2NW1/4
SW1/4
Sec. 3: Lot 1
SE1/4NE1/4
E1/2SE1/4
Sec. 9: SW1/4SW1/4
Sec. 10: NE1/4NE1/4
Sec. 11: NW1/4NE1/4
N1/2NW1/4
NW1/4SW1/4
Sec. 12: E1/2SE1/4
Sec. 20: SE1/4NE1/4
Sec. 21: N1/2NE1/4
Lot 6
W1/2SE1/4
SE1/4SE1/4
Sec. 24: SE1/4SE1/4
Sec. 28: W1/2NE1/4
SE1/4NE1/4

T. 43 N., R. 87 W.
Sec. 3: S1/2SW1/4
NW1/4SE1/4
Sec. 4: Lot 2
SW1/4NE1/4
E1/2SE1/4
Sec. 5: E1/2SW1/4
W1/2SE1/4
Sec. 7: E1/2NE1/4
Sec. 8: NE1/4NW1/4
E1/2SW1/4
Sec. 9: NE1/4SE1/4
Sec. 10: N1/2NW1/4
SW1/4NW1/4

APPENDIX B

TABLE B-3 (Continued)

DESCRIPTION OF TRACTS THAT MAY BE SUITABLE FOR CONSIDERATION FOR DISPOSAL

Land Description
Township/Range

T. 43 N., R. 87 W. (Cont.)
Sec. 17: E1/2NE1/4
S1/2SW1/4
Sec. 19: NE1/4SE1/4
Sec. 20: NW1/4NE1/4

T. 43 N., R. 87 W.
Sec. 20: E1/2NW1/4
SW1/4NW1/4
NW1/4SW1/4
Sec. 21: NE1/4
Sec. 22: SW1/4NW1/4
SW1/4SW1/4
SE1/4SE1/4
Sec. 26: NW1/4NW1/4
Sec. 27: NW1/4N21/4
SE1/4NW1/4
W1/2SW1/4
SW1/4NE1/4
NE1/4NE1/4
Sec. 30: E1/2SE1/4
Sec. 31: NE1/4NE1/4
Sec. 34: S1/2NE1/4
NE1/4NW1/4
Sec. 35: NW1/4NE1/4
E1/2NW1/4

T. 43 N., R. 90 W.
Sec. 14: E1/2SE1/4
Sec. 26: NW1/4
Sec. 30: Lot 5
SW1/4NE1/4

T. 44 N., R. 86 W.
Sec. 1: S1/2SW1/4
Sec. 2: SE1/4SW1/4
E1/2SE1/4
Sec. 11: N1/2NE1/4
S1/2SW1/4
NE1/4SE1/4
Sec. 12: NW1/4
N1/2SW1/4
SE1/4SW1/4
Sec. 14: SW1/4NE1/4
SE1/4NW1/4
NE1/4SW1/4
NW1/4SE1/4
Sec. 15: SE1/4SW1/4
W1/2SE1/4
Sec. 22: NE1/4NW1/4
Sec. 24: E1/2NE1/4
SE1/4NW1/4
SE1/4SE1/4
Sec. 25: S1/2SE1/4
Sec. 33: SE1/4SE1/4
Sec. 34: NW1/4SW1/4
Sec. 35: E1/2NE1/4
NE1/4SE1/4

T. 44 N., R. 87 W.
Sec. 1: Lot 3
SE1/4NW1/4

Land Description
Township/Range

T. 44 N., R. 87 W. (Cont.)
Sec. 6: Lot 3
Lot 4
Sec. 8: SW1/4NW1/4
W1/2SW1/4
SE1/4SW1/4
Sec. 17: N1/2NW1/4
NW1/4SW1/4
Sec. 29: S1/2NE1/4
SE1/4NW1/4
NE1/4SW1/4
SE1/4
Sec. 32: NE1/4
SE1/4NW1/4
Sec. 33: SE1/4NE1/4
S1/2NW1/4
W1/2SE1/4

T. 44 N., R. 88 W.
Sec. 1: NW1/4NE1/4

T. 44 N., R. 94 W.
Sec. 5: Lot 3

T. 45 N., R. 86 W.
Sec. 1: S1/2NE1/4
NE1/4SE1/4
Sec. 4: Lot 3
SE1/4NW1/4
Sec. 31: Lot 3
Lot 4
E1/2SW1/4
Sec. 32: S1/2NE1/4
Sec. 35: NW1/4NW1/4

T. 46 N., R. 86 W.
Sec. 1: SW1/4NE1/4
Sec. 3: Lot 54
Lot 6/4
Lot 74
Lot 84
Sec. 4: Lot 1
Lot 4
Sec. 12: NE1/4NW1/4
Sec. 13: SW1/4SW1/4
Sec. 14: SE1/4SE1/4
Sec. 17: W1/2NW1/4
Sec. 26: NE1/4NE1/4

T. 46 N., R. 87 W.
Sec. 1: S1/2NW1/4NW1/4
SE1/4NW1/4
NE1/4SE1/4
Sec. 13: E1/2E1/2
SW1/4SE1/4
Sec. 14: SW1/4SW1/4
Sec. 24: NE1/4NW1/4
Sec. 25: SE1/4SW1/4
SW1/4SE1/4
Sec. 29: NE1/4SW1/4
S1/2SW1/4
NW1/4SE1/4
Sec. 30: NE1/4SW1/4

Land Description
Township/Range

T. 46 N., R. 88 W.
Sec. 2: Lot 63
Lot 74
Lot 8
Lot 9
SE1/4SE1/4
Sec. 11: Lot 1
Sec. 13: Lot 2 B
Lot 3 I
Lot 5
Lot 6
Lot 7
Sec. 14: Lot 1/4

T. 47 N., R. 86 W.
Sec. 10: NE1/4NE1/4
Sec. 11: NW1/4NW1/4
SE1/4SW1/4
SE1/4
Sec. 12: N/2NE1/4
SW1/4NE1/4
Sec. 12: SW1/4
SE1/4SE1/4
Sec. 13: E1/2NE1/4
NW1/4NW1/4
Sec. 14: NE1/4NE1/4
Sec. 15: SW1/4SE1/4
Sec. 24: SE1/4
Sec. 25: E1/2NE1/4
S1/2NW1/4
W1/2SW1/4
Sec. 34: NE1/4NW1/4

T. 47 N., R. 87 W.
Sec. 21: S1/2SE1/4
Sec. 28: SE1/4SW1/4
Sec. 33: S1/2S1/2NW1/4NE1/4
NE1/4NW1/4
Sec. 34: S1/2SW1/4NE1/4
S1/2NW1/4
N1/2SE1/4
Sec. 35: W1/2SW1/4SW1/4
SE1/4SW1/4SW1/4

T. 47 N., R. 88 W.
Sec. 17: Tract 64 B
Tract 64 C
Tract 64 D
Sec. 21: Lot 2
Lot 3

T. 47 N., R. 89 W.
Sec. 3: Lot 7
Lot 8

T. 47 N., R. 92 W.
Sec. 10: NW1/4SW1/4

T. 48 N., R. 88 W.
Sec. 29: Lot 2

TABLE B-3 (Continued)

DESCRIPTION OF TRACTS THAT MAY BE SUITABLE FOR CONSIDERATION FOR DISPOSAL

Land Description
Township/Range

T. 48 N., R. 89 W.
Sec. 18: N1/2SW1/4NE1/4
NE1/4NW1/4
N1/2SE1/4NW1/4
Sec. 25: N1/2N1/2
S1/4SW1/4
NE1/4SE1/4
S1/2SE1/4
Sec. 26: N1/2NE1/4

T. 48 N., R. 90 W.
Sec. 2: Tract 91
Tract 92
Tract 93
Sec. 3: Lot 5
Lot 6
Lot 7
Lot 8
Sec. 4: Lot 6
Lot 7
Lot 8
Tract 49
Tract 50
Tract 61
Tract 62
Tract 63
Sec. 5: Tract 51
Sec. 10: Lot 1
Sec. 11: Lot 1
Lot 2

Land Description
Township/Range

T. 48 N., R. 90 W. (Cont.)
Lot 3
Lot 4
Lot 5
Lot 6
Tract 103
Tract 104

T. 49 N., R. 90 W.
Sec. 4: Lot 9
Lot 15
Sec. 8: Tract 61 B
Tract 61 I
Sec. 19: Lot 6
Sec. 29: Lot 1
Lot 2
SW1/4NW1/4
NE1/4SW1/4
SE1/4SW1/4
Sec. 30: Lot 5
Lot 6
Sec. 32: Lot 1
Lot 2
Sec. 33: Lot 2
Lot 4
Lot 5

T. 51 N., R. 89 W.
Sec. 6: E1/2

Land Description
Township/Range

T. 52 N., R. 88 W.
Sec. 9: SW1/4NW1/4
Sec. 29: SE1/4SE1/4
Sec. 32: N1/2NE1/4
SW1/4NE1/4
N1/2SE1/4
Sec. 33: NW1/4SW1/4

T. 52 N., R. 89 W.
Sec. 30: SW1/4
Sec. 31: N1/2SE1/4

T. 52 N., R. 92 W.
Sec. 1: Lot 5
Tract 66 A
Tract 66 B
Tract 66 C
Tract 66 D
Sec. 6: Lot 8
Lot 9
Lot 10
Tract 56 E
Tract 56 F
Sec. 7: Lot 5

T. 53 N., R. 91 W.
Sec. 31: SE1/4SE1/4
Sec. 32: SW1/4SW1/4
Sec. 35: E1/2NE1/4

APPENDIX B

TABLE B-4

DESCRIPTION OF TRACTS THAT MAY BE SUITABLE FOR CONSIDERATION FOR ACQUISITION

Land Description
Township/Range

T. 41 N., R. 86 W.
Sec. 3: Lot 7
Lot 8
Lot 9
Sec. 4: Lot 5
Lot 6
Lot 7
Lot 8
Lot 9
Lot 10
Lot 11
Lot 12
Lot 14
Sec. 5: Lot 5
Lot 6
Lot 7
Lot 8
SE1/4NE1/4
Sec. 11: Tract 42
Sec. 16: Tract 65
Sec. 24: Lot 1
Lot 2
NE1/4

T. 41 N., R. 88 W.
Sec. 16: Tract 48
Sec. 21: Lot 2
Lot 3
Lot 4
Lot 5
Tract 50A
Tract 50B
Tract 50C
Tract 50D

T. 41 N., R. 89 W.
Sec. 6: Lot 2
Lot 3
Sec. 7: Lot 3
NE1/4SW1/4

T. 42 N., R. 86 W.
Sec. 25: SE1/4SW1/4
W1/2SE1/4
Sec. 32: S1/2SW1/4
Sec. 33: SW1/4
Sec. 36: All

T. 42 N., R. 87 W.
Sec. 8: NW1/4
SE1/4
Sec. 9: SE1/4
Sec. 16: All

T. 42 N., R. 88 W.
Sec. 1: SW1/4SW1/4
Sec. 2: Lot 4
SE1/4NW1/4
NW1/4SE1/4
SE1/4SE1/4

Land Description
Township/Range

T. 42 N., R. 89 W.
Sec. 2: S1/2NE1/4
SW1/4
N1/2SE1/4
Sec. 10: NE1/4
S1/2
Sec. 11: NW1/4
Sec. 15: W1/2
Sec. 16: All
Sec. 19: E1/2SE1/4
Sec. 20: All
Sec. 22: NW1/4
SE1/4
Sec. 29: NW1/4
N1/2SW1/4
Sec. 30: E1/2NE1/4
S1/2
Sec. 31: SW1/4SE1/4

T. 42 N., R. 90 W.
Sec. 10: S1/2SE1/4
Sec. 15: E1/2SW1/4
E1/2SW1/4
W1/2SE1/4
nel/4
Sec. E1/2W1/2
Sec. 36: All

T. 42 N., R. 92 W.
Sec. 1: SW1/4
Sec. 2: Lot 2
Lot 3
Lot 4
S1/2NE1/4
Sec. 3: NW1/4SW1/4
Sec. 4: SE1/4
Sec. 9: E1/2
Sec. 12: E1/2
Sec. 13: NE1/4
S1/2
Sec. 15: W1/2
Sec. 16: All
Sec. 18: Tract 38
Sec. 22: W1/2
Sec. 27: NW1/4NW1/4
SE1/4NW1/4
NE1/4SW1/4
Sec. 34: SE1/4SW1/4
Sec. 36: All

T. 42 N., R. 93 W.
Sec. 2: SW1/4SW1/4
Sec. 3: W1/2SE1/4
SE1/4SE1/4
Sec. 9: W1/2NW1/4
SE1/4NW1/4
NE1/4SW1/4
Sec. 13: S1/2
Sec. 17: SW1/4SW1/4
Sec. 18: SW1/4SE1/4

Land Description
Township/Range

T. 43 N., R. 86 W.
Sec. 19: SE1/4NE1/4
Sec. 20: SW1/4NW1/4

T. 43 N., R. 87 W.
Sec. 1: W1/2SW1/4
Sec. 2: E1/2
Sec. 11: E1/2E1/2
Sec. 12: SW1/4
Sec. 14: NE1/4
NE1/4NW1/4
S1/2NW1/4
Sec. 36: All
Sec. 16: Tract 44
Sec. 35: Tract 50

T. 43 N., R. 94 W.
Sec. 16: Lot 1
Lot 2
Lot 3
Lot 4
E1/2
E1/2W1/2

T. 44 N., R. 86 W.
Sec. 5: Lot 3
Lot 4
S1/2NW1/4
Sec. 7: Lot 11
Lot 12
Sec. 16: All
Sec. 18: Lot 5
Sec. 19: S1/2SE1/4
Sec. 29: NW1/4
NW1/4SW1/4
Sec. 30: N1/2NE1/4
NE1/4NW1/4
NE1/4SE1/4
S1/2SE1/4

T. 44 N., R. 87 W.
Sec. 9: E1/2SW1/4
SE1/4
Sec. 10: NE1/4SW1/4
NW1/4SE1/4
Sec. 13: S1/2NW1/4
Sec. 14: SE1/4NE1/4
NE1/4SE1/4
Sec. 15: S1/2S1/2
Sec. 16: All
Sec. 19: NE1/4NW1/4
Sec. 26: SW1/4SW1/4
Sec. 27: E1/2SE1/4
Sec. 34: E1/2NE1/4
NE1/4SE1/4
Sec. 35: NW1/4
Sec. 35: N1/2SW1/4
W1/2SE1/4
SE1/4SE1/4
Sec. 36: All

T. 44 N., R. 88 W.
Sec. 31: Tract 44

TABLE B-4 (Continued)

DESCRIPTION OF TRACTS THAT MAY BE SUITABLE FOR CONSIDERATION FOR ACQUISITION

Land Description
Township/Range

T. 44 N., R. 94 W.
Sec. 5: Lot 4
Lot 5
Sec. 6: Lot 1
Sec. 16: Lot 1
Lot 3
N1/2
NE1/4SW1/4
SE1/4

T. 45 N., R. 86 W.
Sec. 16: All

T. 45 N., R. 87 W.
Sec. 4: SW1/4SW1/4
Sec. 5: S1/2
Sec. 6: SE1/4
Sec. 7: NE1/4NE1/4
Sec. 8: N1/2
NE1/4SW1/4
N1/2SE1/4
SE1/4SE1/4
Sec. 9: W1/2W1/2
Sec. 16: All
Sec. 22: NW1/4
W1/2SW1/4
Sec. 27: W1/2NW1/4
SE1/4NW1/4
E1/2SW1/4
SW1/4
Sec. 34: W1/2NE1/4
N1/2SE1/4
Sec. 35: N1/2S1/2
Sec. 36: All

T. 45 N., R. 88 W.
Sec. 2: Tract 39
Sec. 36: Tract 49

T. 45 N., R. 89 W.
Sec. 17: W1/2E1/2
W1/2
Sec. 18: E1/2E1/2

T. 45 N., R. 93 W.
Sec. 16: All

T. 45 N., R. 94 W.
Sec. 36: Tract 43

T. 45 N., R. 95 W.
Sec. 36: All

T. 46 N., R. 86 W.
Sec. 16: All
Sec. 30: SE1/4SW1/4
S1/2SE1/4
Sec. 31: NE1/4
SE1/4NW1/4
NE1/4SW1/4
NW1/4SE1/4
Sec. 32: NE1/4

Land Description
Township/Range

T. 46 N., R. 87 W.
Sec. 7: SE1/4NW1/4
Sec. 8: SW1/4SE1/4
Sec. 16: All

T. 46 N., R. 88 W.
Sec. 35: Tract 62
Sec. 36: Tract 63

T. 46 N., R. 90 W.
Sec. 9: All
Sec. 10: W1/2
Sec. 35: Tract 39

T. 47 N., R. 87 W.
Sec. 16: All

T. 48 N., R. 87 W.
Sec. 6: Lot 8
E1/2SE1/4
Tract 70
Sec. 7: E1/2NE1/4
Sec. 8: Tract 68
(portion)
Sec. 16: Tract 54
Tract 55
Tract 57

T. 48 N., R. 88 W.
Sec. 13: SE1/4NW1/4
NE1/4SW1/4
Sec. 14: NE1/4SE1/4
Sec. 16: Tract 37
Sec. 35: SE1/4SW1/4
SW1/4SE1/4
Sec. 36: All

T. 48 N., R. 89 W.
Sec. 16: All
Sec. 17: SE1/4NE1/4
S1/2S1/2
Sec. 26: S1/2NE1/4
SE1/4NW1/4
NE1/4SW1/4
SW1/4SW1/4
Sec. 27: SW1/4SE1/4
Sec. 34: N1/2NE1/4
SE1/4NW1/4
Sec. 36: All

T. 49 N., R. 87 W.
Sec. 16: Tract 53
Sec. 31: Lot 14
Lot 15
Sec. 32: Lot 4
Lot 5

T. 49 N., R. 88 W.
Sec. 11: Lot 5
SW1/4SW1/4
Sec. 15: Tract 51
Sec. 22: Lot 1

Land Description
Township/Range

T. 49 N., R. 88 W. (Cont.)
Lot 2
SW1/4NE1/4
Sec. 22: W1/2
SE1/4
Tract 50C
Tract 50D
Tract 50H
Sec. 23: Lot 2
Lot 3
SW1/4
Sec. 36: NE1/4
SE1/4NW1/4
N1/2SE1/4

T. 49 N., R. 89 W.
Sec. 1: Lot 8
Lot 9
SW1/4NE1/4
S1/2NW1/4
Sec. 2: S1/2N1/2
Sec. 3: Lot 5
Sec. 11: Tract 66
Tract 65
Tract 64
Sec. 13: Tract 63
Sec. 14: Tract 62
Sec. 16: All
Sec. 17: SW1/4SE1/4
Sec. 36: Tract 52

T. 50 N., R. 88 W.
Sec. 15: Tract 38
Sec. 33: SE1/4SE1/4
Sec. 34: S1/2SW1/4
SE1/4
Sec. 35: S1/2
Sec. 36: SW1/4
S1/2SW1/4

T. 50 N., R. 89 W.
Sec. 16: Tract 63
Sec. 25: Lot 6
Lot 7
Lot 8
Lot 9
S1/2SW1/4
W1/2SE1/4
Sec. 34: Lot 2
N1/2SE1/4
Sec. 35: Lot 2
Lot 7
Lot 8
Lot 10
Sec. 36: Lot 1
Lot 2
Lot 3
Lot 4
Tract 76

T. 50 N., R. 92 W.
Sec. 36: All

TABLE B-4 (Continued)

DESCRIPTION OF TRACTS THAT MAY BE SUITABLE FOR CONSIDERATION FOR ACQUISITION

Land Description
Township/Range

T. 50 N., R. 93 W.
Sec. 24: Lot 2
Lot 3
Lot 7
Tract 48 (portion)
Tract 49 (portion)
Tract 50 (portion)
Sec. 25: Tract 51 (portion)
Tract 53 (portion)
Tract 54 (portion)

T. 51 N., R. 89 W.
Sec. 11: SW1/4NE1/4
Sec. 13: Tract 38
Tract 39
Sec. 14: NE1/4NW1/4
NW1/4SW1/4
Tract 40
Sec. 16: All
Sec. 17: NW1/4SW1/4
S1/2SW1/4
Sec. 18: SE1/4
Sec. 19: NE1/4
NE1/4NW1/4
Sec. 19: N1/2SE1/4
Sec. 20: W1/2NW1/4
NW1/4SW1/4
Sec. 22: SW1/4NE1/4
Sec. 24: Tract 41
Sec. 36: Tract 44

Land Description
Township/Range

T. 51 N., R. 90 W.
Sec. 16: All
Sec. 18: Lot 7
Lot 8
E1/2SW1/4
Sec. 36: Tract 53

T. 51 N., R. 91 W.
Sec. 13: Lot 1
Lot 2
Lot 3
Lot 4
N1/2
N1/2SW1/4
Sec. 24: NE14
N1/2SE1/4

T. 51 N., R. 93 W.
Sec. 3: SW1/4SW1/4
Sec. 27: Lot 1
Lot 2
Lot 3
Tract 44 (portion)
Tract 45 (portion)
Tract 46 (portion)

T. 52 N., R. 88 W.
Sec. 21: W1/2NW1/4
Sec. 32: SE1/4SE1/4

T. 52 N., R. 89 W.
Sec. 36: Tract 43

T. 52 N., R. 90 W.
Sec. 2: Lot 9
Lot 10

Land Description
Township/Range

T. 52 N., R. 90 W. (Cont.)
Lot 11
Sec. 2: Lot 12
Lot 13
Lot 14
Lot 15
Lot 19
Lot 20
Tract 40A
Tract 40B
Tract 40C
Tract 40D
Sec. 3: Lot 12
Lot 13
Lot 14
Lot 15
Sec. 16: All
Sec. 36: Tract 46

T. 52 N., R. 91 W.
Sec. 10: Lot 1
Lot 2
Lot 3
N1/2SW1/4
SW1/4SW1/4
NW1/4SE1/4
Sec. 15: Lot 1
Sec. 16: All
Sec. 36: All

T. 53 N., R. 89 W.
Sec. 30: SW1/4NE1/4
S1/2NW1/4
N1/2SW1/4
NW1/4SE1/4

T. 53 N., R. 90 W.
Sec. 25: N1/2
N1/2SE1/4

APPENDIX D

SUMMARY OR ALLOTMENT CONDITION AND AUTHORIZED USE

This appendix consists of Table D-1 which summarizes the allotment condition and authorized livestock grazing use for each allotment in the Washakie Resource Area.

The ecological range condition shown on Table D-1 relates to the present plant community of each ecological site in relation to the climax (natural potential) plant community for that site. The ecological condition was determined by a field trip to each range site. At each site, an estimate was made of the relative proportion of each plant species compared to the total production of the site. This estimate was compared to the proportions that should be present in the climax community. No total production estimates in pounds/acre were recorded, therefore, no adjustments in condition classes were made if total production of the site was less than expected.

TABLE D-1

SUMMARY OF ALLOTMENT CONDITION AND AUTHORIZED USE

Allotment Number and Name	Management Status M,I,C	Rank[1] No.	Total Acres	Ecological Range Condition Class				Unclassified or Unmapped	Public Land Acres	Other Acres	Kind of[2] Livestock	Season of Use	Public Land AUMS
				Excellent	Good	Fair	Poor						
0001 Manderson Group	I	3	6,531	648	3,490	1,225	837	331	6,531	0	C	04/16 to 08/30	779
											S	02/01 to 02/28	
0002 Weber Lower	I	1	35,390	2,930	17,463	10,903	448	3,646	32,156	3,234	S	05/06 to 06/20	2,410
											S	09/16 to 02/13	
											C	05/09 to 07/30	
											C	09/01 to 10/31	
0003 Forks	I	1	4,510	745	2,077	1,139	0	549	4,510	0	H	04/16 to 12/15	1,096
											C	05/10 to 07/10	
											C	10/16 to 11/15	
0004 Gapen Hyatt	I	1	12,943	158	4,131	4,762	2,721	1,171	10,139	2,804	C	05/15 to 07/14	870
											C	11/01 to 11/30	
0005 Southside Group	I	1	35,585	5,557	19,755	5,242	988	4,043	27,798	7,787	H	03/01 to 02/28	3,563
											C	05/01 to 06/30	
											C	10/26 to 11/21	
0006 Sand Creek Group	I	3	9,374	113	3,471	4,267	375	1,148	8,511	863	C	04/16 to 06/15	729
											C	11/01 to 12/31	
0007 Worland Catt1e Grp	I	2	14,870	2,008	608	2,084	1,741	8,429	13,270	1,600	C	05/01 to 02/05	1,110
0008 Cast1e Gardens	I	2	20,926	3,255	13,158	2,588	538	1,387	18,359	2,567	C	04/15 to 06/25	3,053
											C	10/22 to 02/8	
0009 Kimball	I	2	9,695	528	8,304	487	102	274	6,352	3,343	C	05/01 to 06/25	865
											S	05/01 to 05/31	
0010 Gordon	M		3,300	2,550	367	355	0	28	2,714	586	C	10/21 to 1/20	863
0011 Joe Henry	I	2	7,083	854	4,406	1,682	0	141	6,522	561	C	04/26 to 06/10	1,301
											S	04/26 to 06/10	
0012 Big Trails Group	I	1	23,443	5,323	9,431	7,788	116	785	22,021	1,422	H	12/01 to 03/31	5,489
											C	04/21 to 06/20	
											C	11/01 to 1/15	
0013 Nowood Individual	C		655	0	237	132	0	286	100	555		None Designated	10
0014 Mileski Badlands	I	2	9,637	289	4,385	4,735	53	175	9,229	408	C	05/15 to 06/14	825
											C	10/01 to 10/30	
0015 Lower Nowater	I	2	4,927	2	1,725	2,382	215	603	4,918	9	S	03/16 to 04/25	699
											S	12/16 to 01/15	
0016 Badlands	I	3	9,416	3,678	4,583	193	0	962	8,462	954	S	04/23 to 05/31	663
											S	12/01 to 01/16	
0017 Rome Hill	M		1,567					1,567	240	1,327	S	06/01 to 10/31	240
0018 Upper Nowater	I	3	6,032	1,010	3,283	966	56	717	6,030	2	S	03/16 to 04/16	743
											S	12/16 to 01/31	
0019 Slope	I	3	7,699	893	3,104	2,203	0	1,499	2,629	5,070	C	04/10 to 06/30	612
											S	09/10 to 11/25	
											C	09/15 to 12/15	
0020 Ainsworth	I	3	2,323	0	1,430	584	0	309	1,682	641	S	05/01 to 05/23	202

TABLE D-1 (Continued)

SUMMARY OF ALLOTMENT CONDITION AND AUTHORIZED USE

Allotment Number and Name	Management Status M,I,C	Rank[1] No.	Total Acres	Ecological Range Condition Class				Unclassified or Unmapped	Public Land Acres	Other Acres	Kind of[2] Livestock	Season of Use	Public Land AUMS
				Excellent	Good	Fair	Poor						
											S	11/26 to 12/15	
0021 Cottonwood	I	3	2,732	14	1,455	627	211	425	2,731	1	C	05/01 to 06/15	283
											C	10/01 to 12/23	
0022 Brokenback	I	3	1,197	315	367	17	0	498	672	525	C	06/18 to 08/31	48
0023 Leikham	I	2	1,879	0	0	1,822	0	57	1,788	91	C	05/01 to 06/15	175
											C	11/01 to 11/30	
0024 Beckley	I	3	1,745	367	676	264	103	335	1,745	0	C&S	04/26 to 06/10	485
											C&S	10/10 to 12/31	
0025 Nowood Individual	I	3	1,446	23	406	672	50	295	1,097	349	C	12/01 to 12/22	72
0026 Cottonwood	I	3	2,715	0	1,462	168	246	839	1,790	925	C	04/24 to 06/30	139
0027 Mountain	I	2	992	0	395	333	0	264	671	321	C	07/01 to 09/30	302
0028 Nowood Individual	C		673	0	278	340	0	55	69	604		None Designated	15
0029 Lost Creek	M		1,443	816	430	21	0	176	110	1,333		None Designated	20
0030 Cottonwood	I	3	5,643	10	1,544	1,820	712	1,557	4,655	988	C	04/20 to 06/20	405
0031 Brokenback	I	1	16,956	4,497	6,438	2,355	68	3,598	12,921	4,035	H	03/01 to 02/28	1,466
											C	06/16 to 01/31	
0032 Hidden Dome	I	2	9,165	200	5,243	3,144	192	386	8,521	644	C	04/01 to 06/15	728
											C	12/01 to 02/10	
0033 Alkali	I	2	2,736	0	494	1,586	281	375	1,969	767	H	01/01 to 03/31	287
											C	05/01 to 06/21	
0034 Sand Creek	I	3	12,162	310	7,210	2,715	78	1,849	12,158	4	S	03/01 to 05/31	1,243
											S	12/01 to 01/27	
0035 Buffalo Canyon	I	3	5,526	1,632	2,315	1,043	22	514	3,979	1,547	S	05/01 to 06/05	719
											S	12/01 to 02/20	
0036 Manderson	C		9,643	1,177	3,581	3,743	301	841	9,328	315	S	01/12 to 04/01	814
0037 Tensleep	I	2	2,592	0	1,819	466	0	307	1,443	1,149	C	04/26 to 06/25	139
0038 Mountain Individual	I	3	5,696	1,894	2,170	469	0	1,163	800	4,896		None Designated	240
0039 Warner Draw	C		702	18	205	439	22	18	701	1	S	05/15 to 08/11	58
0041 Fatty Allen	I	3	1,362	82	1,060	43	0	177	1,315	47	C	04/20 to 06/05	166
											C	11/06 to 12/21	
0042 East Fork	I	2	9,028	878	378	399	0	7,373	8,193	835	C	05/01 to 06/22	900
											C	11/01 to 01/15	
0043 North Tensleep	M		2,307	975	869	232	137	94	1,737	570	C	05/01 to 06/15	100
											C	11/10 to 12/31	
											H	02/01 to 06/30	
0044 South Tensleep	M		980	0	539	99	329	13	602	378	C	11/01 to 11/15	49
0045 South Pasture	I	3	1,140	63	126	839	6	106	328	812		None Designated	67
0046 Sand Springs	I	3	1,586	0	401	663	0	522	1,447	139	C	06/15 to 06/30	160
											H	07/01 to 01/31	
											C	09/16 to 10/25	
0047 Hyattville Ind.	I	2	2,924	188	1,666	597	288	185	2,884	40	C	04/20 to 06/19	210
0048 Neiber	I	1	25,310	35	11,793	7,368	143	5,971	24,460	850	C	11/22 to 04/15	2,075
											S	12/15 to 03/14	

TABLE D-1 (Continued)

SUMMARY OF ALLOTMENT CONDITION AND AUTHORIZED USE

Allotment Number and Name	Management Status M,I,C	Rank[1] No.	Total Acres	Ecological Range Condition Class				Unclassified or Unmapped	Public Land Acres	Other Acres	Kind of[2] Livestock	Season of Use	Public Land AUMS
				Excellent	Good	Fair	Poor						
0049 Murphy Dome	I	3	2,884	828	945	557	0	554	1,891	993	C	03/01 to 04/30	423
											C	01/06 to 02/28	
0050 Mud Creek	I	1	2,301	682	267	603	271	478	662	1,639	C	12/06 to 05/15	170
0051 Farley	I	3	2,315	0	1,422	666	0	227	706	1,609	C	05/01 to 05/15	80
											C	11/01 to 11/30	
0052 Prevo Individual	C		291	5	203	49	11	23	291	0	C	04/16 to 06/05	25
0053 Ranch Individual	C		938	51	240	128	0	519	280	658	C	06/01 to 06/30	54
0054 North Paintrock	I	3	1,333	218	467	595	21	32	1,333	0	C	04/22 to 05/16	101
0055 Individual	C		247	0	174	69	0	4	201	46	H	05/01 to 09/30	25
0056 Scott Min	I	2	1,583	856	358	61	15	293	506	1,077	S&C	06/10 to 10/15	177
0057 Individual	I	2	2,963	22	139	1,485	839	478	2,821	142	C	05/01 to 08/31	155
0058 Mathews Ridge	I	1	2,319	201	1,374	83	12	649	2,319	0	C	07/01 to 10/31	416
0059 North House	C		455	91	226	131	0	7	455	0	H	12/16 to 03/31	26
0060 Mesa	M		1,034	80	710	0	0	244	96	938	C	06/01 to 06/30	22
0061 Ainsworth Individual	M		1,263	266	244	59	0	694	108	1,155	C	06/01 to 06/30	10
0062 Ainsworth	I	2	1,988	310	871	543	0	264	1,065	923	C&H	05/01 to 06/25	130
0064 Spanish Point	I	1	3,310	407	2,015	25	0	863	1,215	2,095	C&S	None Designated	185
0065 Sheep Springs	M		2,036	29	1,729	0	0	278	1,263	773	S	06/01 to 06/30	501
											C	07/01 to 07/31	
											C	09/01 to 11/15	
											S	09/20 to 11/20	
0066 Meyers Spring	I	1	1,807	124	596	817	39	231	1,682	125	S	06/01 to 09/30	416
											S	11/01 to 11/25	
0067 Deeter	M		5,345	919	1,222	1,028	15	2,161	565	4,780	C&S	None Designated	119
0068 Box Elder	I	2	2,742	283	1,273	732	57	397	936	1,806	C	None Designated	423
0069 Mahogany Butte	I	1	3,435	735	1,418	766	0	516	2,680	755	C	05/01 to 06/15	433
											C	04/15 to 08/31	
0070 S V	I	2	3,260	286	2,215	34	77	648	3,016	244	C	04/11 to 06/10	330
											C	11/01 to 11/30	
0071 Chalk Butte	M		4,737	551	3,604	312	0	270	4,724	13	C	11/30 to 06/10	644
0072 Helms	M		1,044	97	716	55	0	176	228	816	S&C	None Designated	45
0073 Sand Creek	I	2	12,199	43	7,329	2,089	304	2,434	11,538	661	S	12/06 to 03/15	1,462
0074 Nowater	I	2	15,648	442	7,768	5,178	236	2,024	13,923	1,725	C	11/27 to 06/05	1,776
											S	04/01 to 05/31	
											S	11/01 to 12/05	
0075 Battle Creek	M		2,997	515	1,890	122	0	470	430	2,567	C	07/20 None Designated	19
0076 Lower Walker	I	2	7,564	922	2,660	2,230	324	1,428	6,091	1,473	C	11/01 to 02/28	555
0077 Middle Walker	I	2	3,889	512	1,491	1,406	0	480	2,554	1,335	C	12/01 to 05/15	310
											H	12/01 to 05/15	
0078 Upper Walker	I	2	2,634	644	370	804	0	816	1,219	1,415	C	11/01 to 04/15	173
0079 Lake Creek	I	2	3,015	13	2,166	612	0	224	1,066	1,949	H	12/01 to 04/30	244
											C	04/16 to 05/31	
											C	10/10 to 11/15	

TABLE D-1 (Continued)

SUMMARY OF ALLOTMENT CONDITION AND AUTHORIZED USE

Allotment Number and Name	Management Status M,I,C	Rank[1] No.	Total Acres	Ecological Range Condition Class				Unclassified or Unmapped	Public Land Acres	Other Acres	Kind of[2] Livestock	Season of Use	Public Land AUMS
				Excellent	Good	Fair	Poor						
0080 Sandfords Murphy Dome	I	2	10,375	3,430	4,878	1,449	98	520	6,644	3,731	C	11/19 to 04/30	888
											H	04/01 to 04/30	
0081 Lower Arno1d	I	2	1,590	0	943	167	291	189	1,568	22	C	05/01 to 05/15	200
											C	11/14 to 11/18	
0082 Upper Arno1d	I	2	1,146	0	545	434	35	132	981	165	C	05/16 to 06/04	276
											C	11/04 to 11/13	
0083 K I S	I	2	2,545	212	1,477	575	0	281	1,607	938	C	06/05 to 06/20	325
											C	08/20 to 11/03	
											H	08/20 to 10/31	
0084 Trapper Creek	I	1	3,094	15	2,550	152	0	377	1,846	1,248	C	None Designated	248
0085 Individual	C		200	0	0	0	0	200	70	130		None Designated	2
0086 Daugherty Dewitt	M		2,470	134	1,186	182	0	968	1,320	1,150	C	05/16 to 06/15	148
0087 Mountain Ind.	M		371	0	119	4	0	188	371	0	C	06/16 to 07/15	75
0088 Patras	I	2	2,513	60	2,067	176	0	210	1,275	1,238	C	05/01 to 12/31	416
0089 Big Bend	I	2	8,472	1,773	4,086	1,859	153	601	7,205	1,267	C	12/16 to 05/15	1,429
0090 Mountain	I	2	6,941	612	3,182	1,636	4	1,507	3,100	3,841	C	05/16 to 06/30	811
											C	09/16 to 12/15	
											H	11/01 to 02/28	
0091 Sand Creek	I	2	26,606	2,506	15,920	4,330	554	3,296	25,189	1,417	C	04/01 to 06/10	2,181
											C	10/17 to 12/20	
0092 Paintrock Canyon	I	1	12,852	937	7,054	1,298	17	3,546	7,637	5,215	C	05/01 to 11/20	1,260
											H	04/16 to 12/31	
0093 Long Point	I	2	1,452	397	409	181	0	465	876	576	C	None Designated	136
0094 Red Hills	I	1	7,500	1,087	4,330	734	644	705	7,387	113	C	04/27 to 07/31	689
0095 Forks	I	1	4,143	395	3,363	128	0	257	4,115	28	H	04/16 to 12/31	1,004
											C	05/01 to 07/31	
											C	10/01 to 12/03	
0096 Bonanza	I	3	1,396	0	227	267	634	267	1,395	1	S	05/01 to 06/15	62
0097 Badlands	M		2,962	1,305	868	391	309	89	2,956	6	C	09/10 to 02/28	611
0098 Slope	M		4,538	0	1,016	284	0	3,238	726	3,812	C	None Designated	60
0099 Individual	C		3,230	1,368	1,251	292	32	287	3,229	1	C	04/16 to 06/05	170
0100 Sand Creek Ind	C		2,035	0	586	1,206	132	111	1,852	183	C	12/01 to 01/07	163
0101 Ranch Individual	M		2,793	80	1,017	646	31	1,019	1,040	1,753	C	05/01 to /10	153
											C	10/16 to 10/30	
0102 Mountain Individual	M		876	12	101	0	0	763	150	726	C	None Designated	43
0103 Lost Creek	M		1,096	489	340	0	0	268	116	980	C	None Designated	12
0104 Cottonwood	I	3	2,690	0	1,164	782	228	516	2,229	461	S	04/10 to 06/05	243
0105 Nowater	I	2	9,733	245	4,292	2,073	85	3,038	9,691	42	S	02/01 to 05/31	732
0106 Bald Ridge	M		2,559	1,152	776	68	0	563	337	2,222	C	None Designated	14
0107 Honey Combs	I	2	31,588	810	13,481	9,342	94	7,861	29,158	2,430	C	04/01 to 06/30	2,320
											C	12/01 to 02/15	

TABLE D-1 (Continued)

SUMMARY OF ALLOTMENT CONDITION AND AUTHORIZED USE

Allotment Number and Name	Management Status M,I,C	Rank[1] No.	Total Acres	Ecological Range Condition Class				Unclassified or Unmapped	Public Land Acres	Other Acres	Kind of[2] Livestock	Season of Use	Public Land AUMS
				Excellent	Good	Fair	Poor						
0108 Dixon Canyon	I	3	953	0	0	600	225	128	823	130	C	07/01 to 07/31	60
0109 Individual	C		2,285	0	446	1,802	15	22	420	1,865	C	None Designated	75
											C	11/24 to 02/02	
0110 Bud Kimball	I	2	8,967	1,425	4,420	2,230	462	430	7,206	1,761	C	04/21 to 06/20	900
0111 Otter Creek	I	2	633	0	270	269	0	94	633		C	06/15 to 10/16	134
0112 Faure Nowater	I	2	3,619	0	1,160	1,256	851	352	3,603	16	S	04/16 to 06/15	471
											S	02/05 to 02/15	
0113 North Nowood	I	3	1,395	0	350	952	69	24	1,395		S	04/01 to 04/22	155
											S	02/01 to 02/13	
0114 South Nowood	I	3	3,534	0	208	2,542	0	784	2,923	611	S	12/01 to 01/08	259
0116 Bader Gulch	M		1,568	0	0	0	0	1,568	484	1,084	C	None Designated	44
0117 Pierson Mountain	M		2,096	0	0	0	0	2,096	240	1,856	C	None Designated	39
0118 Big Bend Common	I	1	14,501	379	6,730	4,607	1,595	1,190	14,238	263	C	12/16 to 04/30	1,663
											S	04/16 to 06/23	
											S	12/01 to 02/04	
0119 Bluebank	M		8,927	4,797	3,685	405	0	40	7,023	1,904	C	04/20 to 06/25	1,267
											C	11/01 to 02/28	
0120 Buffalo Creek	I	2	5,061	1,657	2,158	846	126	274	3,860	1,201	C	04/16 to 06/20	924
											C	11/01 to 02/10	
0122 Harvard Individual	M		2,884	0	0	0	0	2,884	238	2,646	C	None Designated	37
0123 Buffalo Sand Point	I	1	40,225	5,860	23,233	8,818	34	2,280	28,614	11,611	C	11/01 to 06/15	6,814
											H	03/01 to 02/28	
0124 West Side Summer	I	1	26,851	2,460	10,125	4,085	501	9,680	9,337	17,514	C	04/16 to 10/31	710
0125 East Side Summer	I	1	5,568	264	3,230	1,086	0	988	2,114	3,454	C	None Designated	460
0127 Otter Creek Pastures	I	1	6,681	0	523	3,652	1,710	796	4,031	2,650	C	05/01 to 05/31	575
											C	11/01 to 11/30	
0129 Lower Mazet	M		2,048	0	1,029	696	0	323	334	1,714		None Designated	26
0130 Lower VS	I	1	3,400	0	1,817	1,249	0	334	1,570	1,830	C	06/10 to 07/09	429
											C	10/01 to 11/15	
0131 High Camp	I	1	1,683	0	416	699	0	568	900	783	C	07/15 to 09/14	216
0132 Cottonwood	I	2	16,083	544	6,937	6,313	723	1,566	14,000	2,083	C	05/01 to 06/09	1,270
											S	05/05 to 06/10	
											S	11/16 to 12/31	
0133 Nowater	I	2	5,304	0	2,607	1,727	132	838	4,834	470	C	05/01 to 06/06	678
											C	11/01 to 12/31	
0134 Bonanza	C		1,707	114	877	337	196	183	1,606	101	C	08/15 to 10/14	141
0135 Nowater State	C		805	0	0	0	0	805		805	S	02/01 to 02/17	115
0136 Black Hills	C		612	0	394	41	103	74	612	0		None Designated	32
0137 South Ind.	I		990	0	577	138	85	190	650	340		None Designated	58
0138 Hurtig	I	3	1,674	129	744	544	141	116	1,674	0	C	04/21 to 06/20	258
0139 Individual	C		407	0	42	22	0	343	40	367		None Designated	7

TABLE D-1 (Continued)

SUMMARY OF ALLOTMENT CONDITION AND AUTHORIZED USE

Allotment Number and Name		Management Status M,I,C	Rank[1] No.	Total Acres	Ecological Range Condition Class Excellent	Good	Fair	Poor	Unclassified or Unmapped	Public Land Acres	Other Acres	Kind of[2] Livestock	Season of Use	Public Land AUMS
0141	Greet Individual	M		949	290	391	97	149	22	272	677		None Designated	52
0142	Individual	I	1	2,459	405	1,310	86	0	658	1,700	759	C	05/20 to 07/10	788
												C	09/16 to 11/15	
0143	Medicine Lodge	I	1	12,634	1,683	6,886	1,388	158	2,519	9,300	3,334	C	06/01 to 10/10	1,200
0144	Lower Nowood	C		14,476	80	10,125	1,610	805	1,856	13,076	1,400	S	01/11 to 05/31	960
												C	11/01 to 06/06	
0145	Cedar Ridge	M		8,799	6,158	1,415	853	129	244	8,482	317	H	10/30 to 05/15	1,321
												S&C	04/21 to 06/15	
												S&C	10/11 to 01/10	
0146	East Allotment	I	2	3,333	286	1,266	929	0	852	703	2,630	C	None Designated	130
0147	West Allotment	I	3	4,233	100	1,968	1,920	18	227	3,076	1,157	C	05/10 to 07/09	515
												C	11/01 to 12/30	
0148	Renner Individual	I	1	16,299	4,279	6,517	1,592	275	3,636	11,052	5,247	C	05/15 to 10/31	1,186
0149	Lost Creek	M		1,242	45	591	0	0	606	19	1,223		None Designated	10
0150	Juniper Hills	M		655	0	603	0	52	0	655	0	H	05/16 to 12/31	56
												C	05/16 to 07/15	
0151	Homestead	C		913	314	324	28	181	66	192	721		None Designated	20
0152	Marys Hill	I	2	1,723	12	703	710	0	298	1,722	1	H	05/01 to 05/31	60
0153	Nowater	C		10,977	1,231	5,100	3,341	0	1,305	9,482	1,495	S	11/16 to 05/18	1,358
0154	Alkali	I	3	1,667	0	458	572	0	637	612	1,055		None Designated	111
0155	Rome Hill	I	2	4,335	0	1,058	29	0	3,248	975	3,360		None Designated	180
0156	Rome Hill	I	2	6,409	0	260	4,380	1,169	600	4,727	1,682	C&S	04/21 to 05/31	558
												C&S	09/16 to 12/15	
0157	South Butte	M		2,732	330	2,079	220	0	103	2,280	452	C	04/23 to 06/18	502
												C	11/08 to 12/30	
0158	Seaman	I	1	14,676	1,199	8,067	3,182	497	1,731	8,900	5,776	C	03/01 to 06/20	1,995
												C	09/11 to 10/31	
0159	Tie Down	C		4,685	0	2,119	1,024	794	748	3,244	1,441	C	05/01 to 09/15	93
0160	Spring Creek Common	I	2	3,302	150	1,301	1,019	0	832	1,557	1,745	C&S	None Designated	152
0161	Individual	C		2,582	0	678	510	0	1,394	2,434	148	C	11/10 to 12/09	219
0162	Slick Water	I	2	11,347	0	4,161	2,897	652	3,637	9,964	1,383	S	04/17 to 05/16	1,388
												S	11/16 to 02/28	
0163	Demer Nowater	I	3	6,483	128	2,322	1,807	158	2,068	6,237	246	S	05/26 to 06/10	803
												S	09/15 to 12/17	
0164	Cottonwood-N.Butte	I	2	10,490	560	4,764	605	2,994	1,567	10,299	191	S	03/18 to 04/17	425
												C	04/20 to 05/19	
												C&S	12/01 to 01/09	
0166	Jacobs Creek	I	3	1,765	0	146	1,377	96	146	622	1,143	S	05/05 to 05/25	103
												C	05/26 to 06/05	
0167	Rome Hill	I	3	3,251	0	497	1,957	103	694	1,405	1,846	C&S	05/26 to 06/30	239
												C	08/01 to 10/15	
												S	11/06 to 11/30	

TABLE D-1 (Continued)

SUMMARY OF ALLOTMENT CONDITION AND AUTHORIZED USE

Allotment Number and Name	Management Status M,I,C	Rank[1] No.	Total Acres	Ecological Range Condition Class				Unclassified or Unmapped	Public Land Acres	Other Acres	Kind of[2] Livestock	Season of Use	Public Land AUMS
				Excellent	Good	Fair	Poor						
0168 Lower Spring Creek	I	3	2,243	0	79	1,702	128	334	1,336	907	C	05/20 to 05/25	34
											C	11/17 to 12/01	
0169 Bader Gulch	M		1,778	0	0	0	0	1,778	200	1,578		None Designated	40
0170 Sand Creek	C		6,149	599	3,165	2,231	0	154	6,071	78	C	04/15 to 06/22	680
0171 East Nowood	C		1,191	151	759	9	153	119	1,059	132	C	12/01 to 01/15	179
0172 West Nowood	I	3	1,064	0	452	406	0	206	906	158	C	04/10 to 06/24	39
0173 Tensleep	I	2	2,173	296	1570	141	64	102	2,033	140	C	05/01 to 05/14	365
											C	12/10 to 01/09	
0174 Lower Brokenback	I	2	1,679	0	1669	0	0	10	1,595	84	C	10/19 to 10/31	107
0175 Upper Brokenback	I	1	6,659	1,084	3,302	1,954	0	319	5,429	1,230	C	05/15 to 06/14	606
											C	11/15 to 11/30	
0177 Red Sprgs Rock Bt	I	1	1,646	727	807	0	0	112	1,198	448	C	10/01 to 10/31	207
0178 Mountain	I	1	2,583	664	1,543	62	0	314	1,196	1,387	C	07/01 to 07/24	407
0179 Tharp Individual	C		571	0	181	90	46	254	367	204	S	05/01 to 05/31	12
0180 Lost Creek	M		3,265	259	1,063	75	0	1,868	200	3,065		None Designated	21
0181 Torchlight	C		20,749	1,096	4,897	12,488	104	2,164	18,340	2,409	S	01/16 to 04/09	1,571
0182 Buttes	I	1	8,621	1,422	3,415	2,331	0	1,453	3,546	5,075			864
											C	05/01 to 06/15	
											S	09/26 to 11/13	
0183 Onion Gulch	I	2	3,304	0	0	0	0	3,304	1,160	2,144	S	06/16 to 09/25	209
0184 Sand Creek	C		13,936	536	8,102	1,834	700	2,764	12,069	1,867	S	03/01 to 04/25	1,567
											S	12/24 to 01/15	
0185 Healy	C		10,763	192	3,444	4,446	0	2,681	10,093	670	S	11/04 to 12/23	651
0186 Alkali	I	2	2,692	0	48	300	921	1,423	2,625	67	C	05/01 to 06/30	342
0188 Small Pasture	I	1	1,695	57	1,309	73	0	256	1,075	620	H	05/10 to 07/11	114
											C&H	10/25 to 11/14	
0189 Jolly Pasture	I	1	1,427	40	649	565	0	173	844	583	C&H	05/15 to 07/11	210
0190 Turner Pasture	I	1	2,016	472	794	0	0	750	761	1,255	C&H	07/12 to 10/24	67
0191 Lower Black Mtn	I	2	2,510	27	1,911	529	0	43	2,510	0	C	05/10 to 08/05	407
0192 Upper Black Mtn	I	3	2,272	176	1,379	560	17	140	421	1,851	C	08/06 to 11/05	80
0193 Mud Creek	I	3	630	0	454	132	0	44	202	428		None Designated	33
0194 Upper Black Mtn	I	2	621	0	428	10	0	183	621	0	C	06/01 to 09/30	136
0195 Lower Black Mtn	I	1	780	0	164	457	0	159	346	434	C	06/01 to 08/15	64
0196 Lake Creek	I	2	1,395	0	459	442	25	469	472	923	C	11/16 to 02/28	58
0197 Duncan	M		454	122	270	49	0	13	375	79		None Designated	37
0198 Brokenback	M		324	25	54	46	4	195	167	157		None Designated	32
0199 Big Cedar	I	2	4,556	59	2,514	1,822	0	61	3,586	870	H	03/01 to 05/31	923
											C	04/16 to 06/20	
											C&H	11/01 to 02/06	

TABLE D-1 (Continued)

SUMMARY OF ALLOTMENT CONDITION AND AUTHORIZED USE

Allotment Number and Name	Management Status M,I,C	Rank[1] No.	Total Acres	Ecological Range Condition Class				Unclassified or Unmapped	Public Land Acres	Other Acres	Kind of[2] Livestock	Season of Use	Public Land AUMS
				Excellent	Good	Fair	Poor						
0200 South Individual	M		3,315	0	2,241	695	199	180	1,613	1,702	H	10/01 to 04/30	184
											C	04/01 to 06/30	
											C	11/01 to 12/31	
0201 Individual	C		474	0	94	334	0	46	124	350	C	05/01 to 07/31	15
0202 Airport	I	3	8,782	394	4,961	2,891	160	376	7,393	1,389	S	02/14 to 03/24	638
											S	04/25 to 05/05	
											C	04/25 to 07/15	
0203 Tobes Pastures	I	1	1,326	494	317	36	0	479	1,161	165	C	07/08 to 09/25	231
0204 North of House	I	2	2,901	81	1,858	503	432	27	758	2,143		None Designated	61
0205 Black Mountain	I	2	1,211	69	937	73	0	132	878	333	C	05/11 to 10/10	141
0206 Bear Creek	I	1	2,204	0	1,143	423	0	638	1,330	874	C	06/15 to 09/14	263
											H	06/15 to 10/15	
0207 Wall	M		2,697	54	1,434	717	0	492	250	2,447		None Designated	65
0208 Tom's	M		718	0	417	183	0	118	718	0	C	07/16 to 10/15	172
0209 French V	I	2	1,822	0	941	86	0	795	980	842	C	07/01 to 09/30	212
0210 Willow Creek	I	2	9,638	1,199	3,063	4,868	0	508	5,461	4,177	C	04/10 to 06/30	931
											C	11/16 to 02/28	
0211 Highway	I	3	251	0	156	27	4	64	251	0	C	05/01 to 05/31	18
0212 Homestead	I	3	237	17	36	94	20	70	111	126		None Designated	12
0213 Individual	C		136	49	65	10	10	2	101	35		Exchange of Use Only	12
0214 Individual	C		386	0	0	0	0	386	87	299	C	05/01 to 05/30	5
0215 Deeded	I	3	4,959	607	3,535	195	378	244	2,334	2,625	C	04/12 to 06/30	408
0216 Mud Gulch	M		1,818	0	1,047	615	37	119	1,743	75	S	12/01 to 01/11	192
0217 East Alkali	I	1	5,788	1,213	2,039	1,576	582	378	4,175	1,613	S	05/01 to 05/31	314
											C	04/26 to 06/30	
											H	04/20 to 11/30	
0218 West Alkali	I	1	14,109	1,177	9,650	1,684	936	662	12,111	1,998	S	05/14 to 05/24	832
											S	11/21 to 01/11	
											C	10/01 to 10/31	
0219 Robson Mtn	M		904	391	210	210	0	93	196	708		None Designated	50
0220 East Flats	C		4,619	0	2,564	1,791	0	264	4,089	530	S	05/18 to 06/13	331
											S	10/16 to 10/30	
0221 Parker	I	2	2,446	130	952	1,179	144	41	1,846	600	C	05/16 to 06/25	136
0222 Anthony Timber	I	2	1,717	478	909	122	0	208	1,144	573	C	06/26 to 09/25	108
0223 Wood's Split Rock	I	3	2,331	0	1,618	482	0	231	300	2,031	C	06/16 to 07/15	75
0501 Kirby Creek	I	1	16,153	107	3,822	3,327	0	8,897	13,051	3,102	S	01/01 to 06/10	2,957
											C	03/01 to 10/15	
0502 South Lucerne Grp	I	3	4,808	57	2,877	177	235	1,462	4,808	0	C	05/16 to 09/30	584
											H	10/15 to 02/28	

TABLE D-1 (Continued)

SUMMARY OF ALLOTMENT CONDITION AND AUTHORIZED USE

Allotment Number and Name		Management Status M,I,C	Rank[1] No.	Total Acres	Ecological Range Condition Class				Unclassified or Unmapped	Public Land Acres	Other Acres	Kind of[2] Livestock	Season of Use	Public Land AUMS
					Excellent	Good	Fair	Poor						
0511	C Pasture	M		737	0	0	0	0	737	224	513	S	05/11 to 06/10	64
0517	Cedar Mountain	C		9,012	0	5,969	521	565	1,957	8,569	443	C	04/15 to 06/20	690
0518	Home Place	M		1,734	25	1,207	153	65	284	1,085	649	C	04/16 to 06/15	175
0547	Red Farm	M		1,524	387	648	170	82	237	1,122	402	C	08/29 to 11/14	172
0562	Gardner Badlands	I	1	11,958	5,837	3,966	1,217	441	497	11,641	317	C	04/01 to 05/31	1,934
												C	11/05 to 12/13	
0563	Winter Camp	I	2	5,422	0	2,638	2,240	0	544	2,305	3,117	C	06/01 to 06/30	341
												C	10/16 to 11/01	
0565	Red Hole	I	2	1,307	24	249	87	0	947	1,307	0	S	06/16 to 07/31	200
0570	Kirby Creek	I	3	6,428	1,522	902	2,135	239	1,630	6,428	0	C	01/01 to 06/05	900
0571	Zimmerman Buttes	I	2	4,071	0	625	654	30	2,762	4,071	0	C	10/20 to 12/31	503
0589	Kirby Creek	I	1	14,583	953	791	1,405	0	11,434	10,146	4,437	S	01/23 to 05/31	1,044
												C	10/01 to 04/30	
												H	12/01 to 02/28	
0591	Zimmerman Springs	I	2	5,728	5	2,408	2,727	134	454	5,027	701	S	10/21 to 01/22	476
0592	Wild Horse Butte	I	2	1,670	0	0	0	0	1,670	1,286	384	C	05/01 to 09/28	203
												S	10/01 to 10/20	
0602	Kirby Creek	I	2	6,451	93	1,690	567	26	4,075	5,155	1,296	H&C	05/01 to 06/10	869
												C	01/01 to 02/28	
0603	Nowater	C		2,719	79	546	660	0	1,434	2,280	439	C	04/01 to 04/30	431
												C	11/01 to 12/30	
0624	Individual	I	2	7,117	873	4,282	827	197	938	4,595	2,522	S	06/16 to 12/31	595
0625	Freeman Draw	C		1,595	57	840	414	33	251	1,073	522	C	05/20 to 06/17	134
0649	Maret	M		646	32	397	136	0	81	548	98	C	05/01 to 05/31	100
												C	11/01 to 12/09	
0656	Sand Draw	I	2	8,031	386	1,534	1,110	261	4,740	7,063	968	S	12/14 to 03/14	1,021
												C	04/16 to 05/30	
												C	10/01 to 11/21	
0658	Red Springs	I	2	2,286	229	704	411	70	872	2,031	255	C	06/07 to 07/15	385
												C	12/01 to 12/15	
0659	Black Willow	I	2	1,958	18	864	755	0	321	1,958	0	C	05/15 to 06/06	444
												C	10/01 to 12/07	
0660	West	C		906	0	755	69	0	82	792	114	C	07/01 to 08/30	106
0667	Turk	M		3,006	0	0	0	0	3,006	300	2,706		None Designated	36

TABLE D-1 (Continued)

SUMMARY OF ALLOTMENT CONDITION AND AUTHORIZED USE

Allotment Number and Name	Management Status M,I,C	Rank[1] No.	Total Acres	Ecological Range Condition Class				Unclassified or Unmapped	Public Land Acres	Other Acres	Kind of[2] Livestock	Season of Use	Public Land AUMS
				Excellent	Good	Fair	Poor						
1502 Jack Creek	I	2	2,518	0	1,598	337	0	583	384	2,134		None Designated	39
1503 Long Point	I	2	3,884	1,017	1,563		0	1,304	1,012	2,872		None Designated	137
1504 Torchlight	C		8,816	461	7,453	365	26	511	8,032	784	S	12/01 to 02/10	508
1507 Mountain	I	1	6,789	1,253	3,538	1,419	0	579	4,165	2,624	C	04/22 to 07/07	412
											C	09/01 to 09/30	
1508 Chimney Rock	M		781	0	547	167	0	67	700	81	C	05/01 to 05/31	36
1510 Fox Mountain	I	2	12,645	1,149	7,386	1,768	1,287	1,055	12,531	114	C	05/01 to 05/31	265
1511 Lake Ridge	I	1	2,021	24	1,316	62	0	619	643	1,378		None Designated	157
1513 Black Mountain	I	1	6,188	2,060	3,054	397	131	546	5,450	738	C	05/21 to 06/20	295
1514 White Creek	I	2	1,751	215	1,277	13	0	246	153	1,598		None Designated	99
1515 Dump	C		4,463	45	149	3,082	105	1,082	4,409	54	S	01/01 to 01/26	124
1517 So. Individual	C		119	74	31	0	0	14	119	0	C	05/01 to 05/09	14
1519 South Shell	I	2	3,716	1,358	2,280	2	7	69	2,935	781	C	05/01 to 07/01	380
1520 Poverty Acres	C		2,594	475	1,352	223		544	1,057	1,537	C	None Designated	54
1521 Individual	M		651	0	463	68	0	120	590	61	C	05/01 to 06/30	41
1523 Go1f Course	C		611	0	541	0	0	70	480	131	C	05/15 to 06/14	20
1524 Alkali	C		306	0	275	31	0	0	306	0	C	06/15 to 07/14	26
1525 Potato	I	2	30,874	5,662	16,837	5,064	1,781	1,530	27,940	2,934	C	04/27 to 06/06	2,543
											H	05/02 to 05/18	
											C	11/01 to 01/20	
1526 Sabin	I	1	1,052	146	657	142	32	75	1,052	0	C	06/07 to 06/30	187
											C	10/01 to 10/30	
1530 Canal Ridge	C		2,197	0	353	1,629	73	142	683	1,514	S	05/01 to 05/30	25
1535 So Shell Group	I	1	13,359	3,348	6,938	1,759	470	844	12,534	825	C	04/26 to 07/10	1,160
1536 White Creek	I	1	8,363	742	4,376	1,703	31	1,511	5,868	2,495	C	04/28 to 07/30	634
											C	09/11 to 10/30	
1537 Potato Ridge	C		9,147	0	4,010	3,133	0	2,004	8,800	347	S	11/01 to 01/31	539
1539 Lower White Creek	M		1,116	23	833	260	0	0	842	274	C	05/01 to 06/30	77
2001	M		375	0	194	125	0	56	375	0		None Designated	80
2002	M		152	0	58	36	0	58	152	0		None Designated	38
2003	M		2,234	0	0	0	0	2,234	80	2,154		None Designated	20
2004	M		478	0	224	41	0	213	478	0		None Designated	66
2005	I	1	1,036	0	594	161	0	281	1,036	0		None Designated	260

TABLE D-1 (Continued)

SUMMARY OF ALLOTMENT CONDITION AND AUTHORIZED USE

Allotment Number and Name	Management Status M,I,C	Rank[1] No.	Total Acres	Ecological Range Condition Class				Unclassified or Unmapped	Public Land Acres	Other Acres	Kind of[2] Livestock	Season of Use	Public Land AUMS
				Excellent	Good	Fair	Poor						
2006	M		34	0	26	0	0	8	34	0		None Designated	10
2007	I	1	1,367	0	553	306	0	508	1,301	66		None Designated	318
2008	I	3	238	0	36	8	0	194	75	163		None Designated	72
2009	M		1,075	0	0	0	0	1,075	80	995		None Designated	10
2010	M		536	0	249	91	0	196	536	0		None Designated	124
2012	M		4,028	0	0	0	0	4,028	4,028	0		None Designated	841
2013 Harriet	M		748	20	515	5	0	208	748	0		None Designated	163
2014	M		479	0	155	0	0	324	158	321		None Designated	26
2015	I	2	163	45	0	110	0	8	163	0		None Designated	44
2016	M		146	0	140	0	0	6	146	0		None Designated	70
2017	M		293	40	195	30	0	28	293	0		None Designated	78
2018	I	3	3,320	0	0	0	0	3,320	1,368	1,952	S	08/01 to 11/30	109
2019 Hazen Draw	I	2	3,760	0	0	0	0	3,760	400	3,360	S	None Designated	80
2503	I	1	16,352	0	0	0	0	16,352	4,570	11,782		None Designated	828
2506 Dye	I	1	6,386	0	0	0	0	6,386	2,868	3,518	S&C	None Designated	460
2507	I	1	3,202	0	1,253	312	2	1,635	1,342	1,860		None Designated	300
2509 Peak Pasture	I	1	9,809	0	1,560	0	0	8,249	3,162	6,647		None Designated	861
2512 Janes	I	1	3,532	0	126	432	0	2,974	520	3,012		None Designated	122
2513 Kirby Creek	I	3	486	0	0	0	0	486	242	244		None Designated	30
2514 V-H Draw	I	1	11,741	0	0	0	0	11,741	2,985	8,756		None Designated	473
2515 Copper Mountain	M		1,970	0	0	0	0	1,970	238	1,732		None Designated	48
2516	I	2	1,789	0	0	0	0	1,789	414	1,375		None Designated	67
2521	I	2	2,649	0	0	0	0	2,649	1,549	1,100		None Designated	240
2525	I	1	5,316	0	0	0	0	5,316	440	4,876		None Designated	75
2529	I	2	1,993	0	0	0	0	1,993	241	1,752		None Designated	51
2530	I	2	2,333	0	0	0	0	2,333	540	1,793		None Designated	95
2531	I	2	2,943	0	0	0	0	2,943	120	2,823		None Designated	24
2536 Basin	I	1	2,086	0	0	0	0	2,086	2,086	0		None Designated	404
2538	I	1	11,418					11,418	2,340	9,078		None Designated	910
2541	I	3	1,051	0	0	0	0	1,051	839	212		None Designated	58
2542	I	2	1,074	0	0	0	0	1,074	440	634		None Designated	96
2543	I	2	4,413	0	0	0	0	4,413	698	3,715		None Designated	156
2546 Major Basin	I	2	5,613	0	0	0	0	5,613	3,749	1,864	C	04/10 to 06/10	811
											C	11/10 to 12/31	

TABLE D-1 (Continued)

SUMMARY OF ALLOTMENT CONDITION AND AUTHORIZED USE

Allotment Number and Name	Management Status M,I,C	Rank[1] No.	Total Acres	Ecological Range Condition Class				Unclassified or Unmapped	Public Land Acres	Other Acres	Kind of[2] Livestock	Season of Use	Public Land AUMS
				Excellent	Good	Fair	Poor						
2547 V Pasture	I	2	4,321	421	2,368	494	398	640	2,213	2,108	H S C	03/01 to 10/31 06/01 to 11/30 08/01 to 02/28	396
2548	I	3	77	0	35	37	0	5	40	37		None Designated	8
2549 Brians Individual	I	2	2,034	16	1,627	113	7	271	774	1,260		None Designated	95
2550 Melton Mountain	I	2	3,931	0	0	0	0	3,931	632	3,299		None Designated	104
2552	I	1	10,197	0	0	0	0	10,197	2,424	7,773		None Designated	454
2554	I	1	8,726	0	0	0	0	8,726	2,217	6,509		None Designated	373
2556	I	1	4,585	0	0	0	0	4,585	755	3,830		None Designated	215
2558	I	1	639	0	0	0	0	639	76	563		None Designated	71
2559	I	1	4,695	0	3,758	514	0	423	2,601	2,094		None Designated	646
2560	I	2	0	0	143	0	0	17	160	0		None Designated	32
TOTALS			**1,518,634**	**149,700**	**622,563**	**308,694**	**43,931**	**393,746**	**1,096,843**	**421,791**			**142,494**

[1] Priority for action within "I" Category allotments

[2] C = Cattle S = Sheep H = Horses

APPENDIX E

PROBLEMS, OPPORTUNITIES AND OBJECTIVES FOR GRAZING MANAGEMENT

Table E-1 describes the most common problems encountered in the administration and management of livestock grazing on public lands in the Washakie Resource Area. It also described in general terms what management actions can be used to correct the problems. The table is intended to provide an overview of how grazing management or administration could be used to improve the situations listed. The situations described do not apply to all allotments, nor do the management actions take into account all multiple use management considerations.

TABLE E-1

PROBLEMS, OPPORTUNITIES AND OBJECTIVES FOR GRAZING MANAGEMENT

Situation	Management Action
Grazing season and grazing habits of different kinds and classes of livestock can reduce the quality and quantity of vegetation produced by a plant community.	Change the season and/or the class or kind of livestock. Designate the season and kind of livestock for the allotments that currently have no designation. Implement grazing systems that will provide for plant maintenance requirements. As a general rule, on all allotment categories, adjustments would limit use prior to seed ripe on key forage species to 1 year out of 2 or 3 in areas with less than 10 inches of annual precipitation and 1 year out of 2 in areas with 10 or more inches of precipitation. A rest cycle would be considered any time use occurs prior to seed ripe. As a goal, use of key species on selected key areas would be limited to a level that would meet the objectives of allotment management, normally a maximum of 50 percent utilization by wildlife and livestock of the current year's production (Bell, 1973).
Livestock use can be poorly distributed within an allotment or pasture. This can result in heavy utilization of some sites while others may receive little or no grazing use.	Develop new water sources to distribute livestock use more evenly. Construct drift fences to alter traditional grazing patterns.

APPENDIX E

TABLE E-1 (Continued)

PROBLEMS, OPPORTUNITIES AND OBJECTIVES FOR GRAZING MANAGEMENT

Situation	Management Action
	Specify locations for placement of salt or mineral supplements.
	Require herding of livestock.
	Authorize the class or kind of livestock that will best utilize the allotment.
Current levels of livestock use may exceed the desired use levels for the allotment.	Adjust the level of livestock use to meet desired levels based on monitoring studies.
Some sites that are now producing a quality and quantity of forage well below their potential have a poor potential to respond to changes in grazing management alone.	Restore productivity of these sites through mechanical treatment, prescribed fire and/or seeding with native species or well-adapted introduced species.
Investments in range improvements needed to implement changes in grazing management often do not have favorable benefit/cost ratios for the U.S. Government.	Solicit contributions from range users and other parties benefiting from changed grazing management. Design grazing management systems that require a minimum investment in range improvements but will meet the stated objectives.
Plant and animal pests can adversely affect livestock and vegetative productivity.	In cooperation with other affected land owners and agencies, take actions to control concentrations of pests.
Some kinds of livestock and/or seasons of use of livestock grazing conflict with wildlife use in the the same areas (Mackie). Diets of sheep overlap significantly with elk antelope and mule deer, and diets of cattle overlap significantly with elk and bighorn sheep in all seasons and with antelope and mule deer in the spring and on poor condition ranges.	Proposed changes in livestock grazing will be evaluated for impacts to wildlife habitat. If identified impacts cannot be mitigated through livestock grazing management (i.e., lighter grazing use levels, grazing systems, nonuse areas, etc.) the proposed changes may not be allowed.
Projects, such as fences and water developments, often change livestock grazing patterns and/or create physical hazards and disturbances. These changes can increase conflicts with current wildlife use, visual resources, watershed, and other resource uses and values.	Proposed projects will be evaluated for impacts to wildlife, wildlife habitat, and other uses and values. If identified impacts cannot be mitigated, the projects may not be allowed.

APPENDIX F

PROBLEMS, OPPORTUNITIES AND OBJECTIVES FOR WILDLIFE HABITAT MANAGEMENT

Table F-1 describes groups of actions undertaken on the public lands that may affect wildlife habitat and wildlife populations. The possibility exists for mitigating the effects of these actions by employing design features and development criteria. The management actions displayed in Table F-1 are suggestions of actions or guidelines that could be used as mitigations. The list is not inclusive and every suggestion is not appropriate for every situation.

In Table F-1, different criteria are shown for different wildlife species. Wherever more than one of these wildlife species are encountered within the same habitat, the guidelines that pertain to the animal with the most restrictive habitat requirements should be followed.

APPENDIX F

TABLE F-1

PROBLEMS, OPPORTUNITIES AND OBJECTIVES FOR WILDLIFE HABITAT MANAGEMENT

Situation	Management Action
Water Development projects for livestock use or watershed control sometimes exclude use by wildlife or cause loss of wildlife habitat.	When a spring is developed, a water source (trough) should be left at the spring site to allow continued access to water and to prevent the subsequent loss of habitat for wildlife. In sage grouse habitat, a 1 acre exclosure around each watersource should be provided at a minimum. The surrounding vegetation will provide brood rearing habitat and escape cover. Small collection ponds should be excavated at the end of free-flowing water lines to collect overflow water. The ponds should be fenced to create microhabitat for wildlife, especially sage grouse and chukar. Where possible, overflow lines could also be placed in ephemeral drainages with established wetland/riparian areas. Water troughs should not be over 20 inches in height to enable antelope and deer to drink. There should also be either an overflow pond or a ground level guzzler at each trough to allow small game and non-game access to water. Water troughs should be installed on a concrete, gravel, or rock foundation with an apron extending 24-36 inches beyond the trough to eliminate excessive soil compaction and erosion. Wildlife escape ramps should be installed and maintained in all water troughs. In upland game bird habitat, reservoirs should be fenced and water piped outside of the exclosure for livestock consumption. A small portion of the reservoir also may be left unfenced for this purpose. This will help promote vegetation to increase, providing escape cover and brood rearing habitat with insects and herbaceous plant growth. Water sources, such as at springs or pipelines, should be kept flowing, to provide water for wildlife.
The construction of fences in wildlife habitats creates impacts to wildlife by restricting movement and causing mortality.	Fence construction and maintenance should conform to Bureau standards. Special fencing needs to accommodate wildlife should be a priority. Fence modifications would be made where necessary to accommodate wildlife.

TABLE F-1 (Continued)

PROBLEMS, OPPORTUNITIES AND OBJECTIVES FOR WILDLIFE HABITAT MANAGEMENT

Situation	Management Action
	Livestock fences should not be over 38 inches in height. Fence height may vary depending on the slope of terrain of the area being fenced. Fences should not be built along the contour of a hill and should tie directly into a hill. This will prevent a big game animal from having to negotiate an uphill jump (over a fence) that is beyond the physical capabilities of the animal.
	Barbed wire fences should not have over four strands of wire. The preference on cattle range is three strands with at least a 12 inch spacing between the top and second wire to help prevent animals from being snared or twisted in the top two wires.
	In antelope or mule deer range, the bottom wire of a fence should be at least 16 inches from the ground. Antelope generally go under fences. This additional space will also allow deer fawns and elk calves to follow their mothers through fence. The bottom wire should be smooth to prevent injury to animals.
	The use of net wire fences will be discouraged and will not be allowed where they will restrict the movement of wildlife. Existing net wire fences may be modified to allow wildlife movement.
	Measures for mitigating impacts to wildlife developed through environmental assessment should be enforced on all fencing projects.
Vegetation manipulation projects can improve or destroy wildlife habitat, depending on the design and execution of the projects.	**Treatments of sagebrush in mule deer, antelope, and elk habitat should meet the following guidelines:** —Mule deer cover habitat in big sagebrush types should not be treated. —Sagebrush treatment areas should be homogeneous blocks wider than 1,250 feet and be lacking a diverse grass/forb layer. —Sagebrush treatment areas should have an excess of cover and insufficient herbacious understory. —Sagebrush in treatment areas is less desirable than grass/forb plant communities.

APPENDIX F

TABLE F-1 (Continued)

PROBLEMS, OPPORTUNITIES AND OBJECTIVES FOR WILDLIFE HABITAT MANAGEMENT

Situation	Management Action
	Treatments in sagebrush areas should be based on 5,000 acre (or less) management units and meet the following objectives: —Treatments should not occur within 330 feet of trees in deer fawning areas. —Treatments should produce a good, evenly dispersed mosaic. —Treatments should not remove more than 50 percent of the available cover of homogeneous sagebrush stands within the habitat management units. —Treatment areas should be: (1) irregular mosaics; (2) long and perpendicular to prevailing winds on winter ranges; (3) no wider than 800 feet; (4) remaining areas of cover should be at least 600 feet wide to 1,200 feet wide, irregular, and continuous, interconnected and scattered.
	Treatments in juniper areas on mule deer and elk range should meet the following objectives: —A canopy closure of 60 percent should be the minimum provided for thermal cover. —Openings in juniper stands should be no wider than 200 feet and should be perpendicular to prevailing winds. —Remaining cover areas should be 600 to 1,200 feet wide.
	Treatments of sagebrush in sage grouse habitat should meet the following guidelines: —Winter habitat should not be treated. —Spring or summer habitat should be treated in the late summer or fall. —Treatments within 2 miles of leks generally are not recommended. —In spring or summer habitat, treatments should not occur when sagebrush canopy density is less than 20 percent. A minimum of 20 percent sagebrush should remain after treatment.

TABLE F-1 (Continued)

PROBLEMS, OPPORTUNITIES AND OBJECTIVES FOR WILDLIFE HABITAT MANAGEMENT

Situation	Management Action
	—Living strips of sagebrush in irregular patterns should be maintained in 300 foot strips on each side of streams. —Treated areas should be no wider than 100 feet. —Untreated areas should be at least 200 feet wide. —Herbicides should be applied with helicopters or ground equipment for best control of the spray. —Sagebrush kills on treated areas should not exceed 90 percent.
	All prescribed fire will be conducted according to a prescription that promotes perennial grass and forb production.
The harvesting of forest products may benefit important wildlife habitats.	Sales of forest products should be conducted in a manner that enhances wildlife habitat for key species of wildlife. Harvesting methods should include, but not be limited to, leaving trees of various ages within logged areas to serve as snag and nest trees. Harvesting methods should provide for nutrient recycling and wildlife habitat. Forest slash should be reduced to a depth of 16 inches or less on at least 75 percent of the area to enhance wildlife habitat and provide for nutrient recycling for plants. Broadcast burns will be used to remove slash where possible. Slash piles should be used to reduce sight distances. Harvested areas should be fenced until successfully regenerated if livestock grazing is a problem. Select harvests should be used instead of clearcuts, when feasible, in an effort to maintain maximum cover.
	Clearcuts should be irregular in shape and less than 10 acres in size. Harvested sites should have sight distances no greater than 300 feet. Timbered travel lanes, at least 300 feet wide, should be left between forest stands.
	Harvest sites should have a timbered perimeter of no less than 300 feet in width to provide security for the big game feeding within the harvested site. Timber harvests should be conducted when wildlife disturbance will be kept to a minimum. Timber

TABLE F-1 (Continued)

PROBLEMS, OPPORTUNITIES AND OBJECTIVES FOR WILDLIFE HABITAT MANAGEMENT

Situation	Management Action
	management activities should be kept to the smallest areas possible, within a single drainage and for the shortest time possible.
	Adjacent drainages should not be logged simultaneously.
	Timber management activities should not occur during the calving period for elk or during the winter. All roads created for timber management but no longer needed should be rehabilitated or closed to vehicular traffic to reduce wildlife disturbance. Trees with cavities should be maintained on all timbered sites. Optimum size of hiding cover patches for elk range from 6.5 to 26 acres. Thermal cover areas range from 30 to 60 acres.
	Forest cover types should be managed to ensure the proper juxtaposition of habitat types.
	The rehabilitation of unstocked forest areas should include shrubs and trees to improve wildlife habitat. Firewood sales would be coordinated with timber harvests, when practical, to improve compliance and to reduce disturbance to wildlife.
	Douglas fir should be planted on all suitable sites.
Oil and gas exploration, development and production activities in winter and crucial winter ranges, severe winter relief areas, elk calving habitat, elk rutting areas, wetland/riparian areas, and threatened and endangered species habitat could cause significant loss of those habitat components.	For habitats affected by oil and gas development, the following practices should be considered to mitigate for losses. These mitigations can include but should not be limited to: field development and operational plans; unitized leasing; single point directional drilling; single point fluid collection or offsite disposal; underground pumps; underground pipelines; underground powerlines placed along road beds; offsite collection and storage facilities; remote monitoring of operations; minimized road and vehicle use (i.e., trips per time period); minimized pad development and maintenance; restrictions on herbicide treatments on lease; road closures; seasonal rather than yearlong maintenance and development; and funding of offsite mitigation habitat including

TABLE F-1 (Continued)

PROBLEMS, OPPORTUNITIES AND OBJECTIVES FOR WILDLIFE HABITAT MANAGEMENT

Situation	Management Action
	maintenance and improvement projects to improve wildlife habitat quality near the developed site. In other habitats pits should have oil removed immediately following accidents and these pits should be covered to prevent wildlife access; enclosed tanks could be used instead of covered pits.
Pesticide applications may affect wildlife food sources and could, in some cases, cause illness or mortality in wildlife populations.	Pesticide applications should be designed and undertaken to reduce impacts to wildlife from toxic effects or loss of food source. Biological control methods should be employed whenever possible.

APPENDIX L

FUTURE DEVELOPMENT PREDICTIONS FOR OIL AND GAS

This appendix consists of Table L, which summarizes the future development predictions for oil and gas based on activity from April 4, 1976 to March 31, 1986, in the Washakie Resource Area.

TABLE L

FUTURE DEVELOPMENT PREDICTIONS FOR OIL AND GAS BASED ON ACTIVITY FROM 4/1/76 TO 3/31/86

	HIGH POTENTIAL	MODERATE POTENTIAL	LOW POTENTIAL	TOTAL
New Field Wildcat Wells				
Number of wells drilled (total)	45	12	3	60
Number plugged & abandoned	43	11	3	57
Number that produce oil or gas	2	1	0	3
New Field or KGSs				
Number of new field discovered	2	1		3
Number of producing wells within these fields during the life of the field	14	4		18
New Pool Wildcat Wells				
Number of wells drilled (total)	30			30
Number of wells that would produce	7			7
Development Wells				
Number of wells drilled	310			310

APPENDIX M

SUMMARY OF ANALYSIS REGARDING "NO LEASING"

The Use of "No Leasing," Planning Area-wide

The planning area-wide elimination of oil and gas leasing was considered early on in the planning process but was eliminated from further study for the reasons listed below. It should have been identified in the Draft RMP/EIS under the section "Alternatives Considered But Eliminated From Further Study."

During scoping and issue identification for the RMP/EIS, it was determined that the Washakie Oil and Gas Environmental Assessment (EA), written in 1980, was still valid and the decisions made from the EA would be carried through the RMP development process. The determination was made through that document ". . . to continue the leasing, exploration and development of Federally owned oil and gas resources in the Washakie Resource Area." A "no leasing" alternative was also analyzed, which considered issuing no leases, resulting in the eventual elimination of oil and gas activities in the resource area.

Under the multiple-use mandate of the FLPMA, all uses of public lands are to be considered unless one use presents a severe and unmitigable impact to other significant values. The majority of the planning area does not possess such important and sensitive surface values and resources that properly managed oil and gas development cannot be a compatible land use. Additionally, the complete elimination of oil and gas activity would have a severe adverse socioeconomic impact on the area's economic base.

The Use of "No Leasing" In Place of "No Surface Occupancy"

Alternative C in the Draft RMP/EIS considered applying "no surface occupancy" to about 16 percent of the federal mineral estate in the planning area to protect important wildlife habitat, and cultural and recreation sites. Alternative D considered applying "no surface occupancy" to about 49 percent of the planning area to protect those values and resources.

It was suggested in the public comments received on the Draft RMP/EIS, that closures to oil and gas leasing would provide more protection for important resources and values than the "no surface occupancy" stipulation. Part of that concern undoubtedly stems from outdated wording in Appendix A of the Draft RMP/EIS, which on page 161 indicates that the "no surface occupancy" stipulation could be modified by the State Director. Current wording in the revised Appendix A is intended to indicate that such modification is possible with a supporting, documented environmental analysis (EA or EIS) and, if necessary, a plan amendment.

Nevertheless, after the public comment period ended, the planning team analyzed a modification of Alternative D, in an effort to determine the validity of public comments received on the "no leasing" versus "no surface occupancy" question. An alternative was considered by the planning team that would have protected specific wildlife, recreation and visual values by closing to leasing the canyons on the west slope of the Bighorn Mountains, the proposed Spanish Point Karst ACEC, threatened or endangered species habitat along perennial streams, elk calving areas, and crucial elk winter ranges. This alternative was considered in detail by the planning team, using the Wyoming BLM Standard Oil and Gas Lease Stipulations.

By way of explanation, the standard oil and gas lease stipulations were developed specifically for application to oil and gas leases at the time they are issued. When a lease is issued, the only action that can be contemplated is the possibility that exploratory drilling may occur somewhere on the leased area. Since oil and gas leases are issued before there is ever a proposal for exploratory drilling and since many leases expire before any exploration occurs, the provision, "This limitation does not apply to operation and maintenance of producing wells," in the seasonal restriction parts of stipulations 2 and 3, was included in the stipulations primarily to cover the exploration stage. Unfortunately, the provision has been misinterpreted to mean that the restriction disappears at the operational stage (i.e. if a producing well is attained). It must be understood that at the exploration stage, with submission of an application for permit to drill (APD), and at the development stage, additional site specific environmental analyses are conducted and any needed restrictions or mitigation measures identified will be become part of the development or operational plan. Thus, it is possible for such seasonal restrictions to be applicable to the maintenance and operation of producing wells, if supported by the environmental analyses.

The team found that the amount of protection given to important surface resources and values would be essentially the same whether using "no leasing" or "no surface occupancy." The only difference in environmental consequences between the two alternatives concerns public revenues. Public revenues from oil and gas leasing would decrease substantially if the 49 percent of the planning area proposed in Alternative D for "no surface occupancy" was actually closed to leasing. A "no surface occupancy" lease would still generate $1 or $2 per acre per year for the duration of the lease, depending upon whether it was leased competitively, non-competitively, or over-the-counter. Compensatory royalties on oil and gas produced from reservoirs underlying these leases would be collected, even with no wells drilled on the lease. If 49 percent of the planning area was closed to leasing, both rentals and royalties would be foregone.

As a result of that additional analysis, it was determined that the use of "no leasing" on large blocks of public lands provides no more protection of surface values and resources than does the use of "no surface occupancy."

APPENDIX N

PUBLIC LAND TRACTS WITHDRAWN OR PENDING WITHDRAWAL

Table N-1 summarizes the BLM administered public lands currently withdrawn from some or all of the various nondiscretionary land laws. Because of the extent and complexity of many of the withdrawals, they are summarized here by Township and Range. Detailed legal descriptions for any of the withdrawals affecting Castle Gardens, Bates Battlefield, stock driveways, and the public water reserves can be obtained by reviewing the appropriate Master Title Plats. The legal descriptions for public water reserves can also be cross referenced by reviewing the Partial Interlocutory Decree, Big Horn Adjudication, Covering the United States' Non-Indian Claims, 1983.

The legal descriptions of the tracts in the proposed Spanish Point Karst Area of Critical Environmental Concern, which are pending withdrawal, are found in Appendix G, in the Draft RMP/EIS.

TABLE N-1

SUMMARY OF WITHDRAWN PUBLIC LAND TRACTS

Category	Township and Range
Castle Gardens:	T. 46 N., R. 89 W.
Bates Battlefield:	T. 41 N., R. 90 W.
Stockdriveways:	T. 41 N., R. 86 W., T. 41 N., R. 87 W., T. 41 N., R. 88 W., T. 42 N., R. 86 W., T. 42 N., R. 87 W., T. 42 N., R. 88 W., T. 42 N., R. 89 W., T. 43 N., R. 88 W., T. 43 N., R. 89 W., T. 43 N., R. 90 W., T. 44 N., R. 86 W., T. 44 N., R. 90 W., T. 44 N., R. 91 W., T. 44 N., R. 92 W., T. 45 N., R. 92 W., T. 46 N., R. 86 W., T. 46 N., R. 87 W., T. 46 N., R. 92 W., T. 47 N., R. 87 W., T. 47 N., R. 88 W., T. 48 N., R. 90 W., T. 49 N., R. 87 W., T. 49 N., R. 88 W., T. 49 N., R. 89 W., T. 50 N., R. 88 W., T. 50 N., R. 89 W.

APPENDIX N

TABLE N-1 (Continued)

SUMMARY OF WITHDRAWN PUBLIC LAND TRACTS

Category	Township and Range
Public Water Reserves:	T. 41 N., R. 90 W., T. 42 N., R. 86 W., T. 42 N., R. 88 W., T. 42 N., R. 89 W., T. 43 N., R. 89 W., T. 43 N., R. 90 W., T. 43 N., R. 91 W., T. 43 N., R. 92 W., T. 43 N., R. 94 W., T. 44 N., R. 86 W., T. 44 N., R. 91 W., T. 44 N., R. 92 W., T. 45 N., R. 86 W., T. 45 N., R. 87 W., T. 45 N., R. 94 W., T. 47 N., R. 88 W., T. 47 N., R. 89 W., T. 47 N., R. 92-1/2 W., T. 47 N., R. 93 W., T. 48 N., R. 87 W., T. 48 N., R. 88 W., T. 49 N., R. 87 W., T. 49 N., R. 89 W., T. 49 N., R. 90 W., T. 49 N., R. 91 W., T. 50 N., R. 88 W., T. 50 N., R. 89 W., T. 50 N., R. 91 W., T. 51 N., R. 88 W., T. 51 N., R. 89 W., T. 51 N., R. 90 W., T. 52 N., R. 89 W., T. 53 N., R. 90 W.

APPENDIX O

CULTURAL RESOURCES/NATURAL HISTORY PROGRAM OBJECTIVES AND IMPLEMENTATION PROCESS

Cultural Resources

Program Objectives

The BLM has developed a cultural resources program designed to inventory, evaluate, and manage cultural resources on BLM-administered public land and in areas of BLM responsibility. The BLM management of cultural resources (archeological, historic, and socio-cultural properties) is in accordance with the provisions of the National Historic Preservation Act of 1966, as amended, and other applicable legislation. The objectives of the program are as follows:

- To protect and preserve representative samples of the full array of cultural resources for the benefit of scientific and socio-cultural use by present and future generations.
- To ensure that cultural resources are given full consideration in all land-use planning and management decisions.
- To manage cultural resources so that scientific and socio-cultural values are not diminished, but rather are maintained and enhanced.
- To ensure that the BLM's undertakings avoid inadvertent damage to cultural resources, both federal and nonfederal.

Inventories

The BLM conducts cultural resource inventories for actions involving public lands and/or federal minerals that include surface disturbance as a part of the action. Three classes of inventory have been established; Class III is the most intensive.

Class I inventories are completed with the use of existing data from cultural resource inventory files maintained by both the BLM and the Wyoming State Historic Preservation Office (SHPO). Professional literature and other sources of data also are employed to complete Class I inventories when appropriate. These inventories serve two basic purposes. When completed for large areas such as a planning unit, Class I inventories establish a baseline that allows full consideration of cultural resources in land-use planning and management decisions, particularly as these decisions relate to the preservation and enhancement of cultural resource values. Class I inventories also are completed for specific areas in which proposed actions may be authorized, when completed for specific proposed actions, Class I inventories serve to identify known properties and are used to determine if more intensive inventory of specific areas is appropriate. This determination is made in consultation with the Wyoming State Historic Preservation Officer and often results in the completion of Class II or Class III inventories.

Class II inventories employ field methodologies that are similar to those used to complete Class III inventories. However, in Class II inventories sampling strategies are used in which a percentage of a given land area is inventoried at a Class III level of intensity and the results are projected over the entire land area. Class II inventories can be used to develop predictive models of the distribution of cultural resources within a given land area. They are often completed early in the planning stages of large projects involving public lands and/or federal minerals.

A Class III inventory is an intensive inventory of a given land area that results is the identification of all cultural resources within that area. Personnel complete Class III inventories by walking parallel transects across land areas with a maximum spacing of 30 meters between transects. Class III inventories are generally required before surface-disturbing actions are authorized on public lands and/or on private or state lands if a federal authorization is involved. This ensures that BLM undertakings do not result in inadvertent damage to cultural resources and provides for the preservation of significant cultural resource values.

Evaluation

The BLM evaluates the significance of cultural resources identified during inventory in consultation with the Wyoming SHPO to determine if the resources are eligible for inclusion on the National Register of Historic Places. To facilitate evaluation of cultural resource values in Wyoming, the BLM has devised guidelines for determining the eligibility of archeological and historical sites and historic trails (BLM Manual supplement 8143). The guidelines supplement the National Register criteria for evaluation (36 CFR 60.4) and provide consistency across the state. Application of the guidelines ensures that significant cultural resources are recognized and managed accordingly.

After determination of eligibility, significant cultural resource properties are further evaluated for assignment to one or more use categories. The BLM has established seven use categories, as follows:

1. Current scientific use is a category that applies to any cultural property that is the subject of an ongoing scientific or historical study or project, under permit or cooperative agreement, at the time of evaluation. Upon completion of that study or project, the cultural property will be assigned to another use category.
2. Potential scientific use is a category that applies to any cultural property determined to be currently eligible for consideration as the subject of scientific or historical study utilizing research techniques currently available, including study that would result in its physical alteration. This category signifies that the cultural property need not be considered in the face of an appropriate research or data recovery (mitigation) proposal.
3. Conservation for future use is a category reserved for any unusual cultural resource that, because of scarcity, a research potential that surpasses the current state-of-the-art, singular historic importance or architectural interest, or comparable reasons, is not currently eligible for consideration as the subject of scientific or historical study that would result in its physical alteration. It is considered worthy of segregation from other land or resource uses that would threaten the maintenance of its present condition, and it will remain in this use category until specified provisions are met in the future.
4. Management use is a category that may be applied to any cultural property considered eligible for controlled alteration, to be conducted by the BLM or other entities concerned with the management of cultural properties. Expenditure of cultural properties or cultural resource data may be justified for purposes of obtaining specific information leading to a better understanding of kinds and rates of natural or human-caused deterioration, effectiveness of protection measures, and similar lines of inquiry, the results of which would ultimately aid in the management of cultural properties.
5. Socio-cultural use is a category to be applied to any cultural resource that is perceived by a specified social and/or cultural group as having attributes that contribute to maintaining the heritage or existence of that group. This category signifies that the cultural resource is to be managed in a way that takes those attributes into account, as applicable.
6. Public use is a category that may be applied to any cultural property found to be appropriate for consideration as an interpretive exhibit-in-place, a subject of supervised participation in scientific or historical study, or related education and recreational uses by members of the general public.
7. Discharged use means that a cultural property that previously qualified for assignment to any of the qualifying characteristics for that use or for assignment to an alternative use, that records pertaining to it present its only remaining importance, and that its location no longer presents management constraint for competing land uses.

When a cultural resource property is assigned to one or more use categories, a decision is made pertaining to the management of that property. The criteria and guidelines for the evaluation of cultural resources and the assignment of significant cultural resource properties to specific use categories would remain unchanged under all the alternatives addressed in this plan.

Management

Management objectives for significant cultural resource values provide a direct link between the assignment of properties to use categories and achievement of the cultural resource program objectives. The BLM defines three basic management objectives for significant cultural resource values, as follows:

Management for Information Potential. Cultural resources managed for information potential are capable of contributing useful scientific, historical, or management information. This information potential is to be protected to the extent needed, by physical or administrative means, until the potential has been realized through appropriate study.

Management for Public Values. Cultural resources managed for public values possess identified socio-cultural, education, recreation, or other public values. Their locations are to be managed in manner that gives adequate consideration to these values.

Management for Conservation. Cultural resources managed for conservation have overriding scientific or historical importance. They are to be managed by the means necessary to maintain them in their present condition and to protect them from potentially conflicting land or resource uses.

Specific actions necessary to accomplish management objectives for a given property are identified through the BLM planning process, which culminates in the implementation of activity plans.

The basic management objectives for significant cultural resource values would remain unchanged under all of the alternatives addressed in this plan.

Specific management actions that could be taken to achieve these objectives at selected significant properties are described in the discussions of the various alternatives. Management objectives for significant properties that have not yet been identified or for which inventory data are insufficient as of this writing will remain unchanged, but management actions for these properties will be prescribed case-by-case and will be addressed amendments to this plan when appropriate.

Natural History

The BLM's natural history program, as administered within the planning area, focuses primarily on the management of public lands in designated and proposed national natural landmarks (NNLs), on the management of paleontological resources, and on cave management.

National Natural Landmarks

The Secretary of the Interior established the National Natural Landmarks (NNL) program in 1962 to recognize and preserve the best examples of various biotic communities and geological features. Although the program is administered by the National Park Service, lands administered by the BLM can be included within designated areas, as can lands in private ownership. Currently there are no NNLs on lands administered by the Washakie Resource Area.

The BLM is responsible for considering the existence and location of NNLs when assessing the effects of its actions on the environment under section 102(2)(c) of the National Environmental Policy Act (NEPA).

Paleontological Resources

Authority and Guidelines

Guidelines to ensure that the BLM in Wyoming meets its statutory obligation for protection of paleontological resources are outlined in the draft Wyoming paleontology manual issued by the Wyoming State Office, BLM. The authority and mandates for the BLM to manage and protect paleontological resources are found in the following legislation:

- Surface Mining Control and Reclamation Action of 1977 (SMCRA)
- Federal Coal Leasing Amendment Act of 1976 (FCLAA)
- Federal Land Policy and Management Act (FLPMA)
- Archeological and Historic Preservation Act of 1974 (88 State. 1974)
- National Environmental Policy Act of 1969 (NEPA)
- Minerals Material Act of 1947, as amended (30 U.S.C. 601 et seq.)
- Historic Sites Act of 1935
- Mineral Leasing Act of 1920
- Antiquities Act of 1906.

Management and Protective Measures

The classifications of paleontological resources determine the procedures to be followed before a paleontological clearance to proceed with a project can be granted. A BLM inventory is required in Class I and Class II areas before surface disturbance can begin. Inventories are not required in Class III and Class IV areas; however, any significant fossil finds are protected.

Significant fossils are known to occur in certain geologic units or formations in the planning area. A paleontological collection permit is required for collection of fossil vertebrates and scientifically significant invertebrate and plant fossils. The intent of the permitting process is to manage the collection of scientifically significant fossils.

A fossil of significant scientific interest is identified by one or more the following characteristics:

- Preservation of soft body parts.
- Preservation of delicate or uncommon shell or skeletal parts of invertebrates.
- Close or intimate association of plants with animals.
- Preservation of the skull, whole isolated bones, or other diagnostic materials of poorly known or unknown vertebrates.
- A high concentration and diversity of plants and animals.
- Fossils poorly known or new to the paleontological literature.
- Unique or significant geographic or stratigraphic position such as type, locality, only known occurrence, or reptile-mammal transition.
- Materials having the potential for clarifying the evolutionary structure, development and behavior of the organism and/or its environment.
- A fossil is not considered significant if (a) it is a species that occurs in large numbers through a large geographic areas or (b) it does not provide additional scientific data not found in other specimens of the same species.
- The significant fossils in the planning area are vertebrate fossils.

Cave Management

The management of caves would be accomplished pursuant to the Worland Cave Management Plan. Cave management would meet the following objectives:

1. To protect fragile biological, ecological, hydrological, and geological cave features from damage and ensure that they are maintained for the use of the public, both now and in the future;
2. To ensure that the cave resources and surface or subterranean activities which could affect cave resources are addressed in land-use plans, and when detailed guidance is necessary, in recreation or multi-resource activity plans;
3. To manage and provide for recreation, education and scientific research opportunities, ensuring that these types of activities do not cause unacceptable impacts to the cave resources; and
4. To promote consistency among Federal agencies with cave management responsibilities, where appropriate, and facilitate the efficient and effective exchange of information between Federal, State, and local agencies and private organizations concerned with the management or protection of cave resources.

National Historic Preservation Act Compliance Process

The following is a detailed, narrative explanation of the flow chart steps illustrated in Figure P-1.

1. The Bureau of Land Management (BLM) may require a cultural survey of a proposed project area. The survey is conducted by either BLM personnel or a cultural resource use permittee. The Wyoming BLM Manual Supplement 8143 establishes the procedure followed to determine if a survey is needed.

2. The BLM specialist or cultural resource use permittee plans the survey project, conducts background research of the project area, reviews regional overviews and other documents for pertinent previous research and terrain and field conditions in the project area. Before beginning fieldwork, the contractor conducts a site file search at the SHPO records office, and if necessary, at the local BLM office.

2A. If the file search reveals that the project area has been adequately surveyed, or if the project area is one of demonstrably low site potential, a resurvey may not be warranted. The responsibility for determining the need for a survey rests with the BLM in consultation with the SHPO.

2B. The results of the file search are documented in a report that should contain a complete bibliographic reference of the previous surveys and summary of previous sites located.

3. The BLM or cultural resource use permittee conducts the field survey of the project area.

If standard inventory requirements would not apply, the overall field methodology, including survey intensity and areal limits, would be determined by the BLM in consultation with the SHPO.

3A. If no sites are discovered during the survey, and if no previously recorded sites are located in the survey area, the negative results of the survey are documented in a Class III report. Cultural resource clearance is obtained and the project proceeds, subject to other resource considerations, as applicable.

3B. If sites are discovered during the survey, or if previously recorded sites are located in the survey area, Steps 4 through 9 are followed.

4. Each site located is recorded on an Inter-Mountain Antiquities Computer System (IMACS) site form.

5. Each new site and each previously recorded site is evaluated for National Register eligibility. Limited testing should be conducted as necessary.

6 & 6A. If a site is not eligible for the National Register, no further work (i.e., testing, monitoring, excavation, or avoidance) is required. If the site contains information important enough to warrant further work, the site should be evaluated as eligible (see Step 7). The evaluation of noneligibility is documented and a recommendation of "no further work" is made in the report.

7 & 7A. If a site is evaluated as eligible for the National Register, the reasons for its eligibility must be documented, with a detailed description of how the site meets the Criteria of Eligibility (36 CFR 60.6). If a site is eligible because of its research potential or information content (36 CFR 60.6(d)) the report must document and discuss the site information content in terms of pertinent research questions which may be addressed.

8. The effect of the project on each eligible site is evaluated and documented. "Effect" is determined by applying the criteria in 36 CFR 800.9.

8A1 & 8A2. If there will be no effect, no further work at the site is warranted. This is documented in the Class III report (see Step 9).

8B1. If the impacts to the site will result in effects, this is also documented in the Class III report (see Step 9).

8B2. Recommendations to mitigate effects should be directed at reducing or eliminating impacts to those qualities which make the site eligible for the National Register. Avoidance or in situ preservation are the preferred options. Data recovery is appropriate if avoidance or in situ preservation are not feasible or cost effective.

9. A report is prepared documenting the results of Steps 1 through 8A2 and(or) 8B2 and copies of the report submitted to the BLM.

10. The BLM, in consultation with the SHPO, and the Advisory Council on Historic Preservation use the information provided in Step 9 to carry the compliance process to completion.

11. After the above process is completed, the proposed land use is permitted with appropriate resource stipulations. In rare cases, the BLM might reject the land use, if the cultural value is of overriding national importance.

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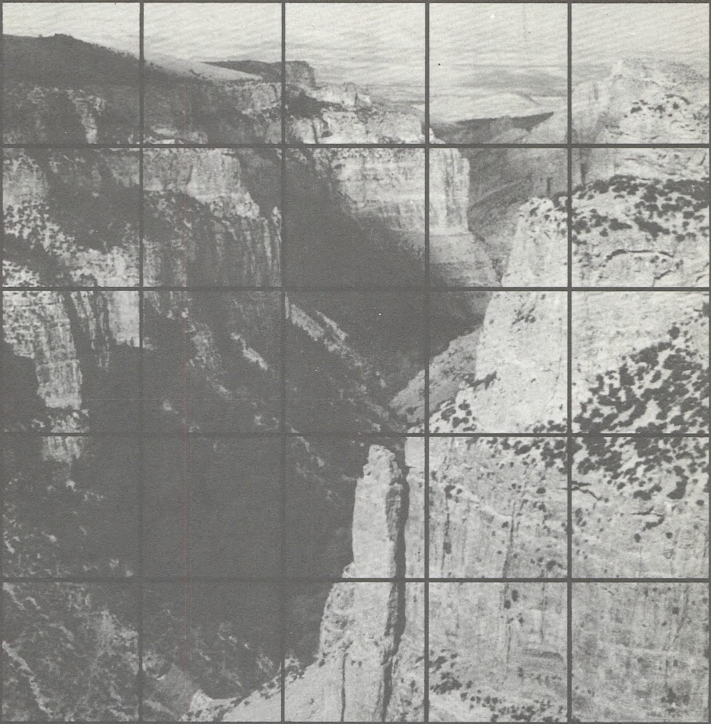

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